

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF KEN-)
TUCKY, INC. FOR A DECLARATORY ORDER)
THAT THE CONSTRUCTION OF PROPOSED)
GAS SAFETY TRAINING FACILITIES IS IN THE) CASE NO. 2016-00181
ORDINARY COURSE OF BUSINESS AND DOES)
NOT REQUIRE A CERTIFICATE OF PUBLIC)
CONVENIENCE)

APPLICATION

Pursuant to 807 KAR 5:001, Sections 14 and 19, Columbia Gas of Kentucky, Inc. (“Columbia”) applies to the Kentucky Public Service Commission (“Commission”) for a declaratory order that Columbia’s proposed construction of a gas safety training facility at its headquarters in Lexington, Kentucky is an ordinary extension in the usual course and does not require a certificate of public convenience and necessity (“Certificate”).

In support of this Application, Columbia respectfully states:

The Applicant

1. Columbia’s full name and post office address is: Columbia Gas of Kentucky, Inc., P.O. Box 14241, Lexington, KY 40512-4241.
2. Its electronic mailing address is pscmailcky@nisource.com.

3. Columbia is incorporated in the Commonwealth of Kentucky and attests that it is in good corporate standing. Columbia was incorporated in Kentucky on October 11, 1905.

4. Pursuant to KRS § 278.380, Columbia waives any right to service of Commission orders by mail for purposes of this proceeding only.¹ Copies of all orders, pleadings and other communications related to this proceeding should be directed to

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¹ On May 25, 2016, Columbia gave notice to the Commission pursuant to 807 KAR 5:001, Section 8, of its intent to file this application and its use of electronic filing procedures.

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Overview

5. Columbia is a public utility as defined in KRS § 278.010(3)(b) and is engaged in the distribution and sale of natural gas, as well as the transportation of customer-owned volumes of gas, in the following Kentucky counties: Bath, Bourbon, Boyd, Bracken, Carter, Clark, Clay, Estill, Fayette, Floyd, Franklin, Greenup, Harrison, Jessamine, Johnson, Knott, Lawrence, Lee, Letcher, Lewis, Madison, Martin, Mason, Montgomery, Nicholas, Owsley, Pike, Robertson, Scott, and Woodford.

6. Columbia operates approximately 2,574 miles of natural gas distribution mains that serve more than 135,000 customers in a 30-county area. In addition to these mains, it is responsible for the operation and maintenance of more than 135,000 meters, service lines and other facilities. To ensure the reliability and safety of these facilities, Columbia employs approximately 113 field employees who are directly responsible for the facilities' installation, repair, and maintenance. These field employees perform

“covered tasks” – operation and maintenance activities on Columbia pipelines that are required by 49 C.F.R. Part 192 and that affect the operation and integrity of those pipelines.²

7. 49 C.F.R. § 192.805 requires that Columbia have and follow a written qualification program that provides training to ensure that all employees who perform covered tasks “have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities.”³ To meet this requirement, Columbia has adopted the “DOT Operator Qualification Plan” (“the Plan”),⁴ a copy of which is attached as Attachment 1 to this Application. A list of 33 covered tasks which Columbia field employees may perform and for which they must be qualified is found at Attachment A of the Plan. After a Columbia employee is qualified on the relevant covered tasks, he or she must periodically be evaluated and again qualified for those covered tasks. A list of the subsequent qualification intervals is found at Attachment B of the Plan. As a result of these requirements, employee training is an integral and constant

² See 49 C.F.R. § 192.801(b).

³ Moreover, KRS § 278.030(2) requires a utility to “furnish adequate, efficient and reasonable service.” “The delivery of safe service is synonymous with ‘adequate’ and ‘reasonable’ service.” *Owen Electric Cooperative: Alleged Failure to Comply with Commission Regulations 807 KAR 5:006 and 807 KAR 5:041*, Case No. 93-145 (Ky. PSC Sept. 18, 1996) at 4.

⁴ All NiSource gas distribution companies have Operator Qualification Plans in place that meet the requirements of 49 CFR § 192.805, including provisions for training and qualifying employees in the execution of applicable covered operating, maintenance, and construction tasks under the plan. The other NiSource gas distribution companies are: Columbia Gas of Maryland, Inc.; Columbia Gas of Massachusetts, Inc., Columbia Gas of Ohio, Inc.; Columbia Gas of Pennsylvania, Inc., Columbia Gas of Virginia, Inc. and Northern Indiana Public Service Company.

part of Columbia's operations and is performed in the usual course of Columbia's business.

8. Columbia historically has used an apprentice model of comprehensive, structured training for its new field employees. It has no centralized training facility. It instead provided new field employees classroom instruction on covered tasks at its headquarters in Lexington, Kentucky, and then provided those employees an extended period of on-the-job training with increasingly demanding hands on work under the supervision of an experienced Columbia field employee under actual field conditions.

9. This historical training model has become more difficult to maintain. In recent years, the Columbia workforce became increasingly older and many of its field employees reached retirement age. With the increased number of retirements, Columbia's workforce is now younger and the opportunities for newer employees to quickly gain the necessary skills to qualify for various covered tasks through one-on-one training with long-tenured field employees are much fewer. Currently 62% of Columbia field employees have five years or less of work experience. Furthermore, the increasingly technical demands of successful gas distribution operations are requiring a higher level of knowledge and training than traditionally has been necessary.

10. As a result of these changes, Columbia, as well as other NiSource gas distribution companies, are adopting a new training approach that immerses new hires in a blend of training including early hands on practice, tightly structured on-the-job train-

ing, and available at time of need performance support. This approach incorporates best-in-class elements, including individualization, skills refreshment, and technology innovation. It is expected to reduce the time necessary for an employee to achieve mastery of covered tasks and to better enable Columbia field employees to keep pace with technological changes and an increasingly complex workplace.

Proposed Training Facility

11. To implement this new training approach, Columbia proposes to construct a training facility on its property at 2001 Mercer Road in Lexington, Kentucky, where its headquarters is located. A preliminary drawing of the proposed training facility is attached to this Application as Attachment 2. The training facility replicates a small town. It consists of 15 small buildings, each of which has gas appliances such as a furnace and water heater as well as a gas meter and other facilities. The facility will have simulated gas, water, electric, and sewer lines and other facilities. The facility will allow for hands-on, realistic training in most covered tasks, including line location, leak survey, emergency relight, turn-ons, meter set installation, trench safety, and emergency response procedures. Classroom training will be conducted at the Columbia headquarters building, which is adjacent to the proposed training facility. In addition to training new field employees, the proposed facility will be used for evaluation and requalification of field employees in covered tasks and training emergency responders, as well as specialized training courses.

12. The proposed training facility will allow Columbia training instructors to immediately reinforce their classroom training to trainees with practical, realistic training scenarios that accurately reflect working conditions. It will allow trainees to repeatedly practice covered tasks and procedures under real world conditions, but in a supervised and controlled environment, as well as facilitate group-based training in which training instructors and other trainees can discuss and provide feedback on individual trainee performance of covered tasks and procedures. Such training is a safer and more effective, efficient, and timely approach than the on-the-job training approach.

13. Columbia proposes to begin construction on the proposed training facility in early 2017, and to place the facility in service no later than November 1, 2017. The cost of the proposed facility is currently estimated to be \$1,955,048. A detailed estimate of the cost classified according to the Federal Energy Regulatory Commission's Uniform System of Accounts is shown at Attachment 3 to this Application. Columbia will not acquire any additional real property to support the proposed facility. No debt will be issued to finance the cost of the proposed facility. Columbia estimates that the training facility will have a 30-year useful service life and an initial annual maintenance and operation cost of \$11,528.

14. Although the proposed facility does not require the approval of the Lexington-Fayette County Planning Commission,⁵ Columbia intends to submit its site plan to that body for review and comment.

Applicable Law

15. The legal standard for determining whether a proposed facility is “an ordinary extension in the usual course of business” is set forth in KRS § 278.020(1) and 807 KAR 5:001§15(3).⁶ KRS 278.020(1) states:

No person, partnership, public or private corporation, or combination thereof shall commence providing utility service to or for the public or begin the construction of any plant, equipment, property, or facility for furnishing to the public any of the services enumerated in KRS 278.010, **except** retail electric suppliers for service connections to electric-consuming facilities located within its certified territory and **ordinary extensions of existing systems in the usual course of business**, until that person has obtained from the Public Service Commission a certificate that public convenience and necessity require the service or construction. [emphasis added].

⁵ See KRS § 100.324(1) (“[P]ublic utilities operating under the jurisdiction of the Public Service Commission, except as specified in KRS 100.987, . . . shall not be required to receive the approval of the planning unit for the location or relocation of any of their service facilities. Service facilities include all facilities of such utilities and common carriers by rail other than office space, garage space, and warehouse space and include office space, garage space, and warehouse space when such space is incidental to a service facility.”).

⁶ *The Application of Northern Kentucky Water District (A) For Authority to Issue Parity Revenue Bonds in the Approximate Amount of \$16,545,000; and (B) A Certificate of Convenience and Necessity for the Construction of Water Main Facilities*, Case No. 2000-481 (Ky. PSC Aug. 30, 2001) at 4 (“When viewed together, KRS 278.020(1) and Administrative Regulation 807 KAR 5:001, Section 9(3) clearly identify those facilities for which a Certificate of Public Convenience and Necessity is not required.”) (referring to § 15(3) prior to revisions in 807 KAR 5:001 resulted in renumbering).

807 KAR 5:001, Section 15(3), provides:

Extensions in the ordinary course of business. No certificate of public convenience and necessity will be required for extensions that do not create wasteful duplication of plant, equipment, property or facilities, or conflict with the existing certificates or service of other utilities operating in the same area and under the jurisdiction of the commission that are in the general area in which the utility renders service or contiguous thereto, and that do not involve sufficient capital outlay to materially affect the existing financial condition of the utility involved, or will not result in increased charges to its customers.

Distilling the requirements of this statute and this regulation to their essentials, the Commission has declared that a Certificate is not necessary “for facilities that do not result in the wasteful duplication of utility plant, do not compete with the facilities of existing public utilities, and do not involve a sufficient capital outlay to materially affect the existing financial condition of the utility involved or to require an increase in utility rates.”⁷

16. “Wasteful duplication” is defined as an “excess of capacity over need” and “an excessive investment in relation to productivity or efficiency.”⁸ A proposed facility does not constitute wasteful duplication unless an “existing facility is reasonably available for the present and future needs of those who will be served by it.”⁹

⁷ *Id.*

⁸ *Kentucky Utilities Co. v. Pub. Serv. Comm’n*, 252 S.W.2d. 885, 890 (Ky. 1952).

⁹ *Covington v. Board of Commissioners*, 371 S.W.2d 20, 23 (Ky. 1963)

17. To determine if a proposed facility's construction material affects a utility's financial condition, the Commission has historically compared the cost of the proposed facility to the present value of the utility's existing facilities. The Commission recently declared:

In assessing whether a proposed project is a system extension in the ordinary course of business, Kentucky courts have traditionally looked to the size and scope of a project in the context of the monetary cost involved. The Commission has similarly adopted this method and likewise looks to the scale of a proposed project in relation to the relative size of the utility and its present facilities.¹⁰

18. The Commission has consistently found that that the construction of a proposed facility whose cost represents two percent of the utility's net utility plant is in the ordinary course of business and does not require a Certificate.¹¹ When examining a

¹⁰ *Application of Northern Kentucky Water District for Approval of Dixie Highway Water Main Improvements, Issuance of a Certificate of Convenience and Necessity and Approval of Financing*, Case No. 2014-00171 (Ky. PSC Aug. 6, 2014) at 4.

¹¹ See, e.g., *Application of East Kentucky Power Cooperative, Inc. for an Order Declaring the Expansion of the Bavarian Landfill Gas to Energy Project to be an Ordinary Extension of Existing Systems in the Usual Course of Business*, Case No. 2015-00284 (Ky. PSC Nov. 20, 2015) (generation facility equal to 0.86 percent of utility's net plant); *Application of Big Rivers Electric Corporation for Approval of an Interconnection Agreement with Kentucky Utilities Company, Tariff Filing of Warren County Water District To Establish the Rockfield School Sewer Capital Recovery Fee*, Case No. 2012-00269 (Ky. PSC Nov. 19, 2012) (sewer main extension equal to 2.1 percent of utility's net plant); Case No. 2007-00058 (Ky. PSC Apr. 16, 2007) (transmission line construction equal to one percent of utility's net plant); *Application of East Kentucky Power Cooperative, Inc. for an Order Declaring the Green Valley and Laurel Ridge Landfill Gas to Energy Projects to Be Ordinary Extensions of Existing Systems in the Usual Course of Business*, Case No. 2002-00474 (Ky. PSC Mar. 3, 2003) (generation facility equal to 1.37 percent of utility's net plant); *Application of Kentucky Turnpike Water District for a Declaration that a Certificate of Public Convenience and Necessity Is not Required or, in the Alternative, for the Issuance of Such a Certificate of Public Convenience and Necessity*, Case No. 98-508 (Ky. PSC Nov. 19, 1998) (water main construction representing two percent of utility's net plant); *The Application of Kenton County Water District No. 1 for Authority to Perform Maintenance at Its Taylor Mill Treatment Plant by Replacing Filter Valves at a Total Cost of Approximately \$700,000*, Case No. 92-028 (Ky. PSC Feb. 18, 1992) (water treatment plant improvements representing less than 1.5 percent of utility's net utility plant). But see also *Application of Delta*

proposed facility that would represent less than one percent of the utility's net utility plant, the Commission recently stated that it "traditionally considers such an increase in total utility plant as ordinary, as it does not materially affect the utility's existing financial condition and will not require an immediate adjustment of its rates."¹²

**Construction of the Proposed Facility Is An
Extension in the Ordinary Course of Business**

19. The construction of the proposed facility meets the definition of an extension in the ordinary course of business as set forth in 807 KAR 5:001, Section 15(3). It will not result in the wasteful duplication of utility plant, will not compete with the facilities of existing public utilities, and does not involve a sufficient capital outlay to materially affect the existing financial condition of Columbia or to require an increase in the rates of Columbia.

20. No Wasteful Duplication of Facilities. The proposed facility will not duplicate any existing Columbia facility. Columbia presently has no centralized training facility to provide hands-on training in covered tasks or procedures for its field employees or to train emergency responders within its service territory.

21. Columbia examined the use of the out-of-state training facilities, but found such use to be costlier than constructing and operating its own training facility.

Natural Gas Company, Inc. for an Order Declaring That It Is Authorized to Construct, Own and Operate A Compressed Natural Gas Station in Berea, Kentucky, Case No. 2013-00365 (Ky. PSC Mar. 30, 2015) (requiring a certificate where proposed facilities represented only 0.65 percent of utility net plant).

¹² *Id.* at 4.

Four NiSource gas distribution companies¹³ have or are constructing similar training facilities. The closest of these facilities is located near Columbus, Ohio. Based upon its 2017 budget projections, Columbia calculates that the annual travel and lost labor productivity costs related to training field employees at this out-of-state facility will exceed by \$86,756 the annual cost of the proposed training facility. These calculations are shown at Attachment 4 to this Application. To the extent that the proposed training facility may be interpreted as duplicating an existing out-of-state facility, it is not a wasteful duplication of facilities as it will result in significant savings or avoided costs to Columbia and its customers.

22. No Competition with Existing Facilities of Other Public Utilities. The proposed training facility will not compete with the facilities of existing public utilities. It is intended to maintain and improve the quality and reliability of the gas distribution system that presently serves Columbia's existing service territory by enabling enhanced training of the Columbia field employees who operate and maintain that system as well as providing invaluable safety training for emergency responders located within Columbia's existing service territory.

23. No Material Effect on Existing Financial Condition. The cost of the proposed training facility will not materially affect Columbia's financial condition. Columbia estimates the proposed facilities will cost \$1,955,048. Columbia's net utility plant as

¹³ These companies are: Columbia Gas of Massachusetts, Columbia Gas of Ohio, Columbia Gas of Pennsylvania, and Columbia Gas of Virginia.

of December 31, 2015, is \$259,607,348. The proposed facility, therefore, represents an increase of 0.75 percent in Columbia's net utility plant. Based upon prior Commission precedent addressing the construction of facilities equal to one percent or more of a utility's net plant,¹⁴ the proposed expenditure is not a materially capital outlay. Moreover, as shown in Attachment 4 to this Application, the construction of the proposed training facility will not increase the rates charged to Columbia customers, but will instead achieve a net annual savings of \$86,756 by avoiding the use of out-of-state training facilities.

Summary

24. Construction of the proposed training facility is an extension in the usual course of business. The proposed training facility addresses a significant need in Columbia's employee training program, will enhance the reliability and adequacy of Columbia's service to the public, and will not result in the duplication of any existing Columbia facility. It will not compete with any existing public utility facility nor infringe upon the existing certificates of other public utilities. Finally, the cost of the proposed facility in comparison to Columbia's net utility plant is relatively small and will not materially affect the utility's existing financial condition or require an increase in utility rates.

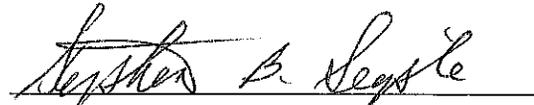
¹⁴ See *supra* footnotes 10 and 11.

WHEREFORE, Columbia respectfully requests that:

1. The Commission expedite its review of this Application and enter a decision on this Application within 60 days of its filing; and
2. Enter an Order declaring that Columbia's proposed construction of a gas training facility at its headquarters in Lexington, Kentucky is an ordinary extension in the usual course of business and does not require a Certificate.

Dated: July 12, 2016

Respectfully submitted,


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**ATTORNEYS FOR
COLUMBIA GAS OF KENTUCKY, INC.**

ATTACHMENT 1



Columbia Gas Distribution Companies¹

Kentucky, Maryland, Ohio, and Pennsylvania

DOT OPERATOR QUALIFICATION PLAN 49 CFR PART 192, SUBPART N

Revised October 1, 2014

- ❖ *Written qualification programs were established for all of the Columbia Gas companies on or before April 27, 2001*
- ❖ *Written qualification programs were established for all of the Columbia Gas companies identifying covered tasks performed on Columbia's facilities on or before April 27, 2001.*
- ❖ *Written qualification programs were established for all of the Columbia Gas companies identifying initial qualification methods for the evaluation of individuals performing covered tasks prior to October 28, 2002.*
- ❖ *All individuals performing covered tasks as of October 28, 2002, and not otherwise directed and observed by a qualified individual, were qualified prior to October 28, 2002.*

¹ The Columbia Gas Distribution Companies (Columbia Gas) are:
Columbia Gas of Kentucky
Columbia Gas of Maryland
Columbia Gas of Ohio
Columbia Gas of Pennsylvania

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The Rule:

49 CFR 192 Subpart N- Qualification of Pipeline Personnel.

Subpart N—Qualification of Pipeline Personnel

§ 192.801 Scope.

- (a) This subpart prescribes the minimum requirements of operator qualification of individuals performing covered tasks on a pipeline facility.
- (b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that:
 - (1) Is performed on a pipeline facility;
 - (2) Is an operations or maintenance task;
 - (3) Is performed as a requirement of this part; and
 - (4) Affects the operation or integrity of the pipeline.

Amdt 192-86 64 FR 46853, Aug 27, 1999

§ 192.803 Definitions.

Abnormal operating condition means a condition identified by the operator that may indicate a malfunction of a component or deviation from normal operations that may:

- (a) Indicate a condition exceeding design limits; or
- (b) Result in a hazard(s) to persons, property, or the environment.

Evaluation means a process established and documented by the operator, to determine an individual's ability to perform a covered task by any of the following:

- (a) Written examination;
- (b) Oral examination;
- (c) Work performance history review; after October 28, 2002 may not be used as the sole method of evaluation.
- (d) Observation during; after December 16, 2004 may not be the used as the sole method of evaluation
 - (1) Performance on the job.
 - (2) On the job training.
 - (3) Simulations; or
- (e) Other forms of assessment.

Qualified means that an individual has been evaluated and can:

- (1) Perform assigned covered tasks; and
- (2) Recognize and react to abnormal operating conditions.

[Amdt 192-86 64 FR 46853, Aug 27, 1999 as amended by Amdt. 192-86A, 66 FR 43523, Aug. 20, 2001]

§ 192.805 Qualification Program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks;
- (b) Ensure through evaluation that individuals performing covered tasks are qualified;
- (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;
- (d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in part 191 of this chapter;
- (e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;
- (f) Communicate changes that affect covered tasks to individuals performing those tasks.
- (g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications are needed;
- (h) After December 16, 2004, provide training as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of the pipeline facilities; and
- (i) After December 16, 2004, notify the Administrator or State agency participating under 49 U.S.C. Charter 601 if the operator significantly modifies the program after the Administrator or State agency has verified that it complies with this section.

[Amdt 192-86 64 FR 46853, Aug 27, 1999; as amended by Amdt 192-100, 70 FR 10332 Feb 25, 2005;

§ 192.807 Record keeping.

Each operator shall maintain records that demonstrate compliance with this subpart.

- (a) Qualification records shall include:
 - (1) Identification of qualified individual(s);
 - (2) Identification of the covered tasks the individual is qualified to perform;
 - (3) Date(s) of current qualification;
 - (4) Qualification method(s).
- (b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

Amdt 192-86 64 FR 46853, Aug 27, 1999

§ 192.809 General.

- (a) Operators must have a written qualification program by April 27, 2001. The program must be available for review by the Administrator or by a state agency participating under 49 U.S.C. 601 if the program is under the authority of the state agency.

- (b) Operators must complete the qualification of individuals performing covered tasks by October 28, 2002.
- (c) Work performance history review may be used as a sole evaluation method for individuals who were performing covered task prior to October 26, 1999.
- (d) After October 28, 2002, work performance history may not be used as the sole evaluation method.
- (e) After December 16, 2004, observation of on-the-job performance may not be used as the sole method of evaluation.

[Amdt 192-86 64 FR 46853, Aug 27, 1999; Amdt. 192-90, 66 FR 43523, Aug. 20, 2001; Amdt 192-100, 70 FR 10332 Feb 25, 2005]

Introduction

Columbia Gas intends to improve pipeline safety by ensuring a qualified workforce and that its operations comply with relevant Federal Pipeline Safety Regulations.

In accordance with pipeline safety regulations defined in 49 CFR part 192, Subpart N, the U.S. Department of Transportation, through its Research and Special Programs Administration (RSPA) [now known as Pipeline and Hazardous Materials Safety Administration (PHMSA)], adopted regulations requiring that all individuals who operate and maintain pipeline facilities “be qualified to operate and maintain the pipeline facilities” and have “the ability to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits”. To ensure its compliance with these regulations, Columbia Gas has adopted this DOT Operator Qualification (OQ) Plan (the Plan). Columbia Gas intends to make its employees, and other individuals who may perform tasks covered under the regulations set forth in Subpart N on behalf of Columbia Gas, aware of the regulatory requirements and the contents of this Plan.

This Plan and its Exhibits provide guidance for

- *Identifying relevant operating and maintenance tasks (Covered Tasks);*
- *Achieving and maintaining compliance with the requirements of Subpart N and;*
- *Establishing and maintaining qualifications to perform Covered Tasks on a Columbia Gas pipeline facility.*

Scope

This written Operator Qualification plan applies to all Columbia Gas employees, contractors and mutual aid individuals who perform covered tasks on behalf of Columbia. It is adopted to comply with 49 CFR Part 192, Subpart N. This plan replaces in its entirety, any prior written operator qualification plans established for Columbia Gas of Kentucky, Columbia Gas of Maryland, Columbia Gas of Ohio², and Columbia Gas of Pennsylvania. .

This written Operator Qualification plan shall become effective April 28, 2004; the initial Columbia Gas state-specific written Operator Qualification plans shall be archived for a period of not less than five years from the effective date of this plan. The initial, established written Operator Qualification plans shall be available upon request until April 29, 2009.

Program Performance and Improvement

Columbia Gas continues to seek program performance improvements through participation in Federal and State OQ seminars, public meetings, presentations and special OQ committee involvement. Pipeline Safety & Compliance (PS&C) and Technical Training remains actively engaged in meetings and presentations with Columbia Gas and Contractor individuals. The meetings and presentations are made up of management, supervision and field employees, from both Columbia Gas and contract companies. Columbia Gas has established a validated qualification curriculum. Part of the validation of this process is allowing affected individuals the opportunity to offer suggestions and comments.

Columbia Gas envisions its Operator Qualification program as a living document. We are dedicated to perpetually seeking, and adopting as appropriate, program performance improvements.

² The date of the original Columbia Gas of Ohio OQ plan was 4-27-2001

Definitions

Ability- means the capacity to do or act, physically and/or mentally.

Abnormal Operating Condition (AOC)- as defined by 192.803 means a condition identified by Columbia Gas that may indicate a malfunction of a component or a deviation from normal operations that may: **(a)** indicate an operating condition exceeding design limits; or **(b)** result in hazard(s) to persons, property, or the environment.

Activity- A specific deed, action, function, or sphere of action.

Affects the Operation or Integrity of the Pipeline- Any activity, or omission of an activity, that could directly or indirectly result in a hazard to persons, property or the environment. As used in the safety context of the OQ rule, the phrase indicates activities that could result in an AOC that in turn could result in an unsafe operating condition.

Alarm – as defined by 192.3 means an audible or visible means of indicating to the controller that equipment or processes are outside operator defined, safety-related parameters.

Alerts - an audible or visible means of indicating to the controller that equipment or processes are outside normal operating parameters

Communicate- To convey information about; make known; to reveal clearly.

Compliance- Activity(ies) in accordance with the rule.

Contributed- Determined to be a factor.

Contributed to- A judgment by designated Columbia Gas personnel, that the action or inaction of an individual(s) was a factor in the occurrence of an incident/accident.

Control Room – as defined by 192.3 means an operations center staffed by personnel charged with the responsibility for remotely monitoring and controlling a pipeline facility.

Controller – as defined by 192.3 means a qualified individual who remotely monitors and controls the safety-related operations of a pipeline facility via a SCADA system from a control room, and who has operational authority and accountability for the remote operational functions of the pipeline facility.

Covered Task- is an activity, identified by Columbia Gas, that: **(1)** is performed on a Columbia Gas pipeline facility; **(2)** is an operations or maintenance task, **(3)** is performed as a requirement of this part (Part 192); and **(4)** affects the operation and integrity of the pipeline

Criterion- A standard upon which a judgment is based.

Current- Belonging to the present time; now in progress.

Demonstrate- Provide tangible evidence.

Determine- To conclude after consideration, investigation, or calculation.

Direct- To take authoritative charge of or supervise; to control, order or command.

Direct Observation- Observation of an unqualified individual(s) during the performance of a covered task by a qualified person,(in that task). Such qualified person must be able to take immediate and effective corrective action if incorrect procedures or AOCs are observed.

Document- Retrievable record.

Evaluator- Persons performing evaluations should possess the required knowledge (1) to ascertain an individual's ability to perform the covered task(s), and (2) to substantiate an individual's ability to

recognize and react to AOCs that might surface while performing those activities. This does not mean that the person performing the evaluations should be physically able to perform the covered task(s) themselves.

Evaluation- means the process set forth in this Plan to assess and document an Individual's ability to perform a Covered Task(s) by any or all, as appropriate, of the following;

- ❑ **Written examination,**
- ❑ **Oral examination,**
- ❑ **Work performance history review** - shall not be the sole method of evaluation,
- ❑ **Observation during:**
 1. Performance on-the-job (shall not be the sole method of evaluation)
 2. On-the-job training
 3. Simulations; or
- ❑ **Other forms of assessment.**

Excavation within a Pipeline Facility- Qualification for this covered task does not require Columbia Gas employee(s) or contractor employee(s) to be proficient in the operation of excavation equipment. Covered tasks requiring qualification shall include: *Verification of line location and depth, *One-Call and underground facility owner/operator notifications, *Sloping / Shoring, *Water removal, and *Inspection. Third party excavations that take place on Columbia Gas pipeline facilities shall be handled in accordance with Columbia Gas's damage prevention and Integrity Management program requirements.

Identify- To establish the identity of; to ascertain the origin, nature, or definitive characteristics of.

Immediate Corrective Action- Taking steps to correct mistakes or abnormal or hazardous conditions without delay.

Individual- means an employee of Columbia Gas or an employee of an affiliated or unaffiliated entity who, on behalf of Columbia Gas, performs one or more Covered Tasks on a Columbia Gas pipeline facility.

Integrity- The ability of a pipeline to operate safely and to withstand the stresses imposed during operations.

Interval- The amount of time between two specified instants, or events.

Knowledge- Understanding gained through experience or study.

Knowledge, Skills, and Abilities (KSA)- An appropriate combination of information, craftsmanship, and proficiency that allows an individual to perform covered task(s) in a competent manner.

Maintain- To keep in a condition of good repair or efficiency.

Maintenance- The act of maintaining or the state of being maintained; the work of keeping something in proper condition; upkeep.

Observe- The act of watching; to watch or perceive. For purposes of conducting qualification evaluations using on-the-job (OJT) performance, observations must include the interaction of the evaluator and qualification candidate to ensure that the candidate's knowledge of the procedures (and the reasons for the key steps therein) is adequate to ensure the continued safe performance of the task. Written documentation of the evaluation materials, i.e. task requirement key steps and AOCs are

utilized during observation to ensure consistent evaluations are administered across Columbia Gas
Operate- Starting, stopping and/or monitoring a device or system.

Operation- Actions taken to facilitate storage or movement of product through a regulated pipeline.

Operator- As defined in 192.3 and 195.2, means a person who engages in the transportation of gas. May also be referred to as Owner when used within NiSource contracts.

Perform- To begin and carry through to completion; to demonstrate in accordance with the requirements of; to accomplish (a covered task) in the proper, customary or established manner.

Person- As defined in 192.3 and 195.2, means any individual, firm, joint venture, partnership, corporation, association, State, municipality, cooperative association, or joint stock association, and includes and trustee, receiver, assignee, or personal representative thereof.

Pipeline- As defined in 192.3 and 195.2, means all parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.

Pipeline facility- means new and existing pipelines, rights-of-way, and any equipment, facility or building owned by Columbia Gas and directly connected to and used in the transportation of gas or in the treatment of gas during the course of transportation.

Prior- Preceding in time or order.

Process- A systematic series of actions directed to some end.

Program- A written description of processes to be followed; a clear delineation of authorities and responsibilities there under and the specific results expected to be achieved for the implementing organization.

Protocol- A standard methodology used to conduct inspections of regulated entities to determine conformance to specific requirements prescribed by regulation.

Provision- The written description of the element(s) or approach employed by Columbia Gas to satisfy the requirements of the OQ rule in 49 CFR Part 192 Sub-Part N.

Pursuant- In accordance with or as a follow-up.

Qualified - As defined in 192.803 means that an Individual has been evaluated and can (a) perform assigned covered tasks; and (b) recognize and react to Abnormal Operating Conditions.

Records- Recorded information or data on a particular subject (OQ), collected and preserved to demonstrate compliance with the OQ rule.

Retain- To keep possession of, in a retrievable and useable condition.

Skill - A demonstrable competency to perform a given task well, arising from talent, training or practice.

Subject Matter Expert (SME) - An individual recognized by Columbia Gas as having a special skill or specialized knowledge of a process in a particular field, or of a piece of equipment.

Supervisory Control and Data Acquisition (SCADA) – means a computer based system or systems used by a controller in a control room that collects and displays information about a pipeline facility and may have the ability to send commands back to the pipeline facility.

Standard - A written document, which is commonly used and accepted as a basis for judging acceptability of performance in the areas addressed.

Task - A piece of work assigned to or expected of an individual(s).

Training - An educational or instructional process (e.g., classroom, computer-based, or on-the-job) by which an individual's KSA level is improved. While not currently required by the OQ rule, training is nonetheless fundamental to implementing many of the OQ Rule's requirements.

Written - To set down in writing in any of various ways.

Covered Tasks

(192.805 (a))

Columbia Gas conducts job task analysis of activities performed on its Pipeline facilities. It then applies the following four-part test (as set forth in 49 CFR 192.801) to each of the identified activities to determine which activities are Covered Tasks:

1. Is the task performed on a pipeline facility;
2. Is the task an operations or maintenance task;
3. Is the task performed as a requirement of 49 CFR Part 192; and
4. Does the task affect the operation or integrity of the pipeline.

Columbia Gas analyzes data gathered during the four-part test and job task analysis to develop a covered task list customized to match Columbia Gas, operating standards.

Process for analyzing data while establishing and maintaining Columbia Gas's identified Covered Task list.

Process to establish Columbia Gas's identified Covered Task list.

PS&C personnel, Technical Training, Engineering, Commercial Operations, and Operations Subject Matter Experts (SMEs) gather and analyze data while applying the four-part test as set forth in 192.801. The data analyzed is gathered from Federal, State and Local regulatory requirements, Columbia Gas operating standards, and manufacturer and vendor instructions. PS&C, along with Technical Training, utilize the findings from this data analysis when determining and justifying the Columbia Gas identified Covered Task list.

Process to maintain Columbia Gas's Identified Covered Task list

PS&C and Technical Training are responsible for identifying:

- New State and/or Federal regulatory requirements affecting Columbia Gas's operating standards and/or identified covered tasks.
- Revised State and/or Federal regulatory requirements affecting Columbia Gas's operating standards and/or identified covered tasks.
- New or revised gas standards (policy and procedures) affecting identified covered task(s).
- Approved and adopted new equipment and/or technology affecting Columbia Gas's operating standards and/or identified covered tasks.
- New or revised information from equipment or product manufactures affecting Columbia Gas's operating standards and/or identified covered tasks.

Process for disseminating and reviewing new and/or revised information

- PS&C will identify the Columbia Gas operating standard(s) affected by the change.
- PS&C will send out an electronic advisory detailing the new or revised information to Technical Training and Operations SMEs for review and comment.
- PS&C will analyze the affect the change(s) will have on existing identified Covered Task(s) or determine if a new identified Covered Task(s) is required. If PS&C determines the change affects a covered task(s), Section F of this plan will be followed.

PS&C working with Technical Training, Commercial Operations, and Operations SMEs will facilitate the necessary changes to Columbia Gas's operating standards to reflect the new or revised information. Technical Training will assess the effect the changes will have on the task(s) and make adjustments to the evaluation and qualification process as necessary.

Attached to this Plan, as Exhibit A, is the list of identified Covered Tasks.

Evaluation of Qualifications

(192.805 (b))

An Individual's qualification to perform a Covered Task will be evaluated using appropriate evaluation methods identified in this Plan.

Evaluator Criteria

Persons with responsibility for evaluating an Individual's qualifications to perform Covered Tasks will have the required knowledge, through training or experience, to ascertain that Individual's ability:

- (1) To perform Covered Tasks
- (2) To recognize and react to Abnormal Operating Conditions that might arise or be observed while performing identified tasks.

Evaluation Methods

Evaluation methods and qualification criteria applied to a Covered Task will vary from task to task. The evaluation method(s) chosen for any specific Covered Task will include one or more of the following, as appropriate:

- Written examination
- Oral examination
- Work performance history review (shall not be the sole method of evaluation; 192.809 c, d)
- Observation during:
 - a. Performance on the job (shall not be the sole method of evaluation; 192.809 e.)
 - b. On-the-job training (OJT), (shall not be the sole method of evaluation; ADB-09-03) or
 - c. Simulation;
- Other forms of assessment.

Evaluation Categories

Transitional qualification - The qualification of Individuals: (1) who performed one or more Covered Tasks on a regular basis prior to August 27, 1999 and (2) who qualify to perform those same Covered Tasks, according to this Plan, prior to October 28, 2002.

It is only during the transitional period of qualification that Columbia Gas may use work history performance review as the sole evaluation method.

Initial qualification - The qualification of Individuals who did not perform a particular Covered Task on a regular basis prior to August 27, 1999.

Subsequent qualification - The evaluation of an Individual's qualification to perform one or more Covered Tasks, after the Individual's transitional or initial qualification to perform the same Covered

Tasks, at intervals established by Columbia Gas. The subsequent qualification process may utilize different evaluation criteria than were used for transitional or initial qualification, and subsequent qualification in no event must occur until after October 28, 2002.

The following criteria will be applied to each Covered Task to determine the appropriate evaluation methodology applied to that task:

1. Frequency of performance
2. Critical nature of the covered task with respect to operation
3. Complexity / Difficulty
4. Existence of checks and balances, such as, Reviews and/or audits
5. Statutory requirements

Non-Qualified Individuals

(192.805 (c))

Columbia Gas permits non-qualified Individuals to perform Covered Tasks under certain circumstances, including but not limited to, the non-qualified Individual's participation in on-the-job training or when working as part of a crew. However, under all circumstances when using non-qualified individuals, the following conditions shall be met:

In compliance with statutory requirements, non-qualified individuals shall not under any circumstances perform the following identified covered tasks:

E1 Welding Pipelines

E2 Performing nondestructive Testing on Steel Pipelines & Welds

F1 Joining Plastic Pipe – Manual & Hydraulic

F1a Joining Plastic Pipe – Manual Only

L1 Tapping & Stopping Pipelines - all Sizes & Pressures

L1a Tapping & Stopping Pipelines - 4" & smaller tap holes; 60 PSIG & less)

L1b Tapping & Stopping Pipelines Self Punch Tees / LP Tapping and Bagging

L1c Tapping & Stopping Pipelines – Self Punch Tees

Non-qualified individuals may perform other covered task(s) if all of the following conditions exist:

- A qualified Individual is assigned to direct and observe non-qualified individual(s) during the performance of a Covered Task.
- A qualified Individual is able to communicate effectively with the non-qualified individual and take immediate corrective actions when necessary.
- The qualified individual is responsible for the performance of the Covered Task.
- The ratio of non-qualified individuals to a qualified Individual is kept to a safe and controllable minimum.

Performance Contributing to an Incident

(192.805 (d))

If there is reason to believe that an Individual's performance of a Covered Task contributed to an incident, as defined under 49 CFR Part 191, as amended, Columbia Gas will initiate an evaluation of that Individual's qualification to perform that Covered Task.

Process to determine whether an Individual needs to be evaluated

In the event of an incident that occurred as a result of, or possibly due in part to, the performance of a Covered Task(s), an investigation performed by the appropriate departments (Field Operations Management, Senior Management, Legal, PS&C, and Technical Training, Commercial Operations) will be completed to determine cause and effect. Subject matter experts may be called upon to assist with the investigation, as appropriate.

- During the investigation the individual(s) **shall not further perform** the Identified Covered Task(s) that may have contributed to the incident. If, in the course of that investigation, Columbia Gas concludes that there is reason to believe that the Individual's performance of the Covered Task(s) contributed to the incident, that Individual's qualification to perform that Covered Task(s) shall be evaluated.
- The individual shall not perform the Covered Task(s) unsupervised until the evaluation is completed and any necessary re-qualification(s) steps have been completed.
- The evaluator(s) will evaluate the Individual in accordance with this Plan.

Reasonable Cause to Verify Qualification

(192.805 (e))

Columbia Gas will evaluate an Individual if there is reason to believe that the Individual is no longer qualified to perform a Covered Task. Concerns regarding an Individual's ability to perform a Covered Task may be prompted by a number of circumstances and reported to Columbia Gas by any person.

Possible reasons to verify an Individual's qualification(s) include, but are not limited to:

- Absenteeism.
- Obvious loss of motor skills, vision impairment, etc.
- Statements made by the individual as to the Covered Task(s) or the individual's own qualification to perform the Covered Task(s).
- Prolonged period of non-performance of Covered Task(s).
- Unsatisfactory performance.
- Columbia Gas has received concerns, negative comments or complaints regarding the individual's performance of a covered task(s).

If reasonable cause is determined to exist, the following process to determine whether an Individual needs to be evaluated will be followed.

1. PS&C and Technical Training, working with Field Operations Management and/or Commercial Operations, will initiate an investigation to determine if reasonable cause exists to evaluate an Individual's qualification to perform the Covered Task(s) in question.
2. If there is reason to believe that the Individual is no longer qualified to perform a Covered Task(s), that Individual's qualification to perform that task(s) shall be revoked. The individual's performance of that Covered Task(s) will be evaluated.
3. The evaluator(s) will evaluate the Individual in accordance with this Plan.

Communicate Changes

(192.805 (f))

Columbia Gas will communicate significant changes that affect a Covered Task to the Individuals who perform that Covered Task. A change may be significant enough to require changes to the qualification process or additional evaluations.

These changes may include but are not limited to:

- Significant modifications to company policies or procedures.
- Significant changes in state or federal regulations.
- Use of new equipment and/or technology that significantly affects Covered Tasks.
- New information from equipment or product manufacturers that significantly affects Covered Tasks.

Responsibility for Communication of Changes affecting Covered Tasks

PS&C, Commercial Operations and Technical Training is responsible for identifying substantive changes affecting an identified task(s).

Technical Training is responsible for revising the evaluation process to include the impact of such changes. PS&C will make a determination as to the level of communication regarding the change that is required.

PS&C will disseminate the information utilizing the Notification of Change Form (Exhibit F) to all appropriate Managers and Supervisors.

Managers and Supervisors will follow the directions identified on the Notification of Change Form. Depending on the level of change, when required, Managers and Supervisors shall conduct an informational meeting providing the information to all affected employees.

Contractors affected by the change shall be required to conduct employee meetings utilizing the Notification of Change Form. The contractor will be required to submit a copy of the Form back to Columbia Gas with employees' signatures.

Action for Communication of change

- PS&C, Commercial Operations and Technical Training will evaluate information regarding changes that may affect an identified covered task(s).
- When appropriate, PS&C will establish a team of subject matter experts to evaluate if the Covered Task(s) in question is significantly affected by internal or external changes.
- Technical Training and/or Commercial Operations will assess the effect the changes will have on the task(s) and make adjustments to the evaluation and qualification process as necessary. These adjustments could involve anything from informing qualified individuals of the changes to requiring complete re-evaluation.

Determining the need to communicate

The need to communicate will vary dependent upon the impact of the change on the Covered Task.

Columbia Gas has established a 3-tiered system for identifying and communicating change.

Level (1) - Limited to no impact on the Covered Task and requires no communication or further action.

Level (2) - Moderate impact on the Covered Task and requires only communication of the change.

Level (3) - Significant impact on the Covered Task and requires communication and modification of the qualification process. Requires training/qualification, as appropriate, for affected Columbia Gas employees and contractor personnel.

Attached to this Plan, as Exhibit F, is the Notification of Change Form.

Subsequent Qualification Intervals

(192.805 (g))

Information gathered from attending Federal and State regulatory Operator Qualification seminars, OQ presentations and OQ public meetings combined with participation in industry recognized gas associations is reviewed to identify Covered Task qualification intervals. Columbia Gas utilizes the information compiled from these sources and considers them while establishing covered task qualification intervals.

An individual's qualifications shall remain valid until the end of the calendar year in which the subsequent qualification is required. Statutory qualification requirements will take precedent and be adhered to by Columbia Gas.

The following criteria will be applied to each Covered Task to determine the appropriate subsequent qualification interval applied to that task:

1. Frequency of performance
2. Critical nature of the covered task with respect to operations
3. Complexity / Difficulty
4. Existence of checks and balances, such as: Reviews and/or audits
5. Statutory requirements

Attached to this plan, as Exhibit B, is a list of subsequent qualification intervals and the Justification Matrix.

Training: Knowledge, Skills and Abilities

(192.805 (h))

Columbia Gas ensures that training is administered for each individual performing Covered Tasks. Appropriate training will be administered to ensure the safe operation of Columbia Gas pipeline facilities. Columbia Gas ensures training includes the knowledge, skills and abilities to safely perform the Covered Task(s).

Training for Operator Qualification requirements

Examples requiring training include but are not limited to:

1. New hires (OJT and classroom)
2. Individuals taking on new Covered Task(s) (New position or Expanded responsibilities)
3. Individuals who fail one or more qualification evaluations (**Ref. Exhibit E**)
4. Level (3) Change to a Covered Task(s) (**Ref. Section F**)

Process for administering training

Process for Newly hired individuals

Newly hired individuals will have a Core Developmental Covered Task List assigned to their Development Plan (Dev Plan) based on the assignment profile for the position they are filling. New hires will work/train within the requirements of **Non-Qualified Individuals (Section C** of this plan) while completing their OJT.

New hires completing OJT will also receive classroom training developed specifically for each Covered Task identified in the new hire's Core Developmental Covered Task List. New hire individuals will attempt to successfully complete certification in OQ task(s) as administered by Technical Training. Technical Training will decide if individuals possess the knowledge, skills and abilities to safely perform the identified Covered Task(s).

Process for individuals taking on new Covered Task(s)

Individuals taking on new Covered Task(s) will have their Dev Plan reviewed and updated by Technical Training to reflect the addition of the new Covered Task(s). These Individuals will follow the process for newly hired individuals for any new Covered Task(s).

Process for Individuals who fail to qualify/re-qualify

A minimum score of 80% is considered a passing score for all covered task evaluations. Individuals who fail one or more qualification evaluation will receive training as appropriate as outlined in **Exhibit E** of this plan.

Process for Individuals affected by change

Level 3 change(s) are when a significant change(s) has occurred affecting a Covered Task(s), which requires communication, training and qualification as appropriate. The need for training will be determined as outlined in **Section F, Action for Communication of Change and Determining the Need to Communicate**. PS&C and Technical Training will assess the effect the change(s) will have on the task(s) and make adjustments to the evaluation and qualification process as necessary. Technical Training will update the existing training program(s) affected to reflect the change(s). Individuals qualified in Covered Task(s) affected by the change(s) will receive training as appropriate to ensure they possess the knowledge, skills and abilities to perform the task(s) in a safe manner.

Records

Records are maintained in the NiSource Learning Management System (LMS).

Modification to Operator Qualification Plan

(192.805 (i))

Columbia Gas will notify the Administrator or State agencies of significant modification to Columbia Gas's Operator Qualification program.

Process for determining significant modifications

PS&C will administer the Columbia Gas Operator Qualification program. As modifications to the Columbia Gas program are required PS&C will be responsible for assessing the significance of the modification. PS&C will assemble a team made up of individuals from each state in which Columbia Gas has distribution facilities. The team will analyze the modification to the program and determine if it is significant in nature warranting communication to State and/or Federal agencies that have audited the program.

Process for communicating significant modifications

When a modification to the program is determined to be significant PS&C will complete a Notification of Change Form (**Exhibit F**) outlining the modification. Compliance Specialists from PS&C will communicate the modification to each state agency utilizing the Notification of Change process.

Record Keeping Methods

(192.807)

Columbia Gas will ensure that the record of an Individual's qualification to perform a Covered Task will be maintained at a central location, or at multiple locations, in one or more of the following formats:

- Electronically
- Paper copies
- Other formats as appropriate and available

Columbia Gas and contractor qualification records will include the following information.

- (1) Identification of the Covered Task(s).
- (2) Identification of the evaluator.
- (3) Evaluation method(s) used.
- (4) Identification of the Individual being qualified.
- (5) Date on which qualification was completed & date on which qualification will expire.

Qualification records will be maintained throughout the period of time that an Individual is qualified to perform a Covered Task(s). Records of an Individual's prior Covered Task qualifications and the qualification records of Individuals who are no longer performing specific Covered Task(s) will be maintained for a period of at least five (5) years from the date a task was last performed. . Employee records will be maintained in the NiSource LMS system. Contractors performing covered task(s) on Columbia Gas facilities shall be required to comply with record keeping methods in a manner that complies with 192.807 and in a manner acceptable to Columbia.

Individuals responsible for project oversight involving the performance of any covered task(s) by a contractor shall assure contract employee OQ records are current for the task(s) to be performed.

Columbia Gas will keep copies of contractor records at designated state business units

Contractors, Mutual Aid, Mergers and Acquisitions

Contractors

Verifying Qualification of Contractor Personnel

Prior to commencement of any work on a Columbia Gas pipeline facility, contractors whose employees perform any identified covered task must initially submit their OQ plan to Columbia Gas for review and approval and then continually update any changes in their OQ program or qualification status of their employees to Columbia Gas.

Exhibit C explains the requirements that contractors are required to meet. Exhibit D can be used to assist in conducting the analysis to verify qualifications for contractor personnel.

Mutual Aid Agreements

Verifying Qualification of Other Operator Personnel

Prior to commencement of any work on a Columbia Gas pipeline facility, non-Columbia Gas operators whose employees or subcontractors perform any identified covered task must initially submit their OQ program to Columbia Gas for review and approval and then continually update any changes in their OQ program or qualification status of their employees and subcontractors to Columbia Gas. The operator's OQ Plan must meet or exceed the requirements of Columbia Gas' OQ Plan for those covered tasks performed by the operator on Columbia Gas' facilities

Emergencies and/or Major Natural Disasters

The occurrence of major natural disasters or other emergencies may necessitate the mutual aid assistance of individuals other than, or in addition to, Columbia Gas employees, contractors and other operator personnel. Specifically, Columbia Gas may require emergency assistance in the performance of covered tasks from employees or subcontractors of another operator or contract company whose qualifications have not previously been reviewed, under circumstances that do not permit a thorough review of the OQ program or qualification status of such operator or contract company prior to the commencement of the emergency assistance.

In order to facilitate such mutual aid assistance in a timely manner without violating 49 CFR 192, Subpart N, as well as applicable state regulations.

Columbia Gas shall verbally confirm that: (1) the operator or contract company has appropriate OQ certifications for the scope of work to be performed; and (2) individuals to be assigned to perform such work have appropriate OQ certifications for the scope of work to be performed.

Such verbal confirmation shall be obtained at the time that the emergency mutual aid assistance is requested when mutual aid agreements have not previously been established. Columbia Gas will perform a thorough review and confirm the qualifications of such operator or contract company as well as associated individuals assigned to perform such work as soon as practical following the commencement of such emergency mutual aid assistance.

Mergers and Acquisitions

In the event the Columbia Distribution Companies are involved in a merger or acquisition, PS&C personnel, Technical Training, Engineering and Commercial Operations, working collaboratively, will conduct a review to ensure compliance of the rule as well as the specifications set forth in this plan.

Exhibit D can be used to assist in conducting the analysis of OQ tasks for mutual aid, mergers and acquisitions.

Management of Change

This plan undergoes an annual review. This section of the plan captures the changes, if any, that are made during that review or any time throughout the year. The MOC Proposed Change Form (Exhibit G) is to be used to submit suggested changes/revisions.

Summary of changes

Date of change	Reason	Location	Description
2007	Annual review	Entire document	
December 2008	Annual review	Entire document	Changed font and cleaned up formatting throughout document
July 2009	Annual review	Entire document	Minor editorial changes - Updated RCT references to the department(s) responsible for those roles today.
		Section C	Added provisions for non-qualified individual(s) who speak and comprehend languages other than English.
		Section K & Exhibit G	New addition the CDC Plan
		Exhibit A	Expounded on the description of some of the tasks so a broader audience would understand what the task contains.
		Exhibit C	Streamlines the table on page 43 and flowchart on page 44.
June 2010	Update	Exhibit A, B & C	Updated to include the new G2 & G3 covered tasks
March 2011	2010 Annual review and Legacy P/P conversion to new gas standards	Entire document	Incorporated Energy Supply Services were applicable
		Section K	Moved management of change from Section K to L and made Section K Contractors, Mutual Aid, Mergers & Acquisitions (previously Exhibit D)
		Section L	Management of change section
		Exhibit A	Updated to include new Gas Standards
		Exhibit C	Updated to reflect new CGV contractor requirements.
		Exhibit D	Updated the gap analysis form and moved it from Exhibit C to Exhibit D.
June 2011	Update	Entire Document	Updated ESS to Commercial Operations and Columbia Energy Distribution Group to Columbia Gas.

Section
L

June 2011	Update	Exhibit C	Reinstated the exemption in Exhibit C that was removed on the 4-1-11 update.
	Update	Section K	Additional explanation to better facilitate the use of mutual aid.
August 2011	Update	Section C	Updated tasks and descriptions not permitted under direct observation
		Exhibit A, B, D	Updated covered task list and descriptions including new tasks.
November 2011	Annual Review	Sections H & J	Updated to include references around record keeping.
		Exhibit A, B, D	Added new tasks D1 and E3
		Exhibit C	Updated 3 rd party provider listing.
		Exhibit F	Updated Form to reflect current practice.
January 2012	Update	Scope	Inserted Ohio plan date footnote.
	Update	Section H	Added language around passing score for OQ evaluations.
	Update	Exhibit A & B	Updated interval language.
July 2012	Update	Exhibit C	Added new 3 rd party provider.
August 2012	Annual Review	Definitions	Updated a few definitions.
		Entire document	Updated Compliance & Technology (C&T) references to Pipeline Safety & Compliance (PS&C) due to recent organizational changes.
December 2012	Annual Review	Exhibit A, B, & D	Added new VA specific task M4H
		Exhibit C	Updated contact info for one of the 3 rd party providers.
May 2013	Update	Entire document	Plan no longer supports Columbia Gas of Virginia. Virginia was pulled out of this plan and has their own stand-alone plan to do OQ program changes taking place in that state.
December 2013	Annual Review	Entire document	Updated GSR references in Exhibit A.
March 2014	Update	Exhibit A, B, & D	Added new covered task; M2A
June 2014	Update	Exhibit A, B, & D	Added new covered task; M4H.1
October 2014	Update	Exhibit C	Update Approved Third Party table

Exhibit A

Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
A1	Operating/Maintaining Propane Air Facilities	NFPA 58 & 59 192.11	Statutory 1 year	GS 1708.050, GS 2950.900,	651-12, 680-1,	K/S	K/S
A1a	Operating Propane Air Facilities	NFPA 58 & 59 192.11	Statutory 1 year	GS 1708.050, GS 2950.900,	651-12, 680-1,	K/S	K/S
D1	Compressor Stations This is a place holder only; Columbia Gas of Pennsylvania owns the Blackhawk Compressor station which is operated and maintained by NiSource Gas Transmission & Storage (NGT&S)						
E1	Welding Pipelines → TO BE PERFORMED BY QUALIFIED INDIVIDUAL ONLY – DIRECT OBSERVATION NOT PERMITTED!	API-1104 192.225 192.235 192.241 192.245	Statutory 6 mo arc 1 year 2 years	Welding Manual GS 1430.320, GS 1730.010, GS 2420.010,	535-4, 641-2, 641-3, 641-4, 641-5, 641-6, 641-7	K/S	K/S
E1a	Visual Inspection of Welds	192.241	3 years	Welding Manual	641-6	K/S	K/S
E2	Perform Nondestructive Tests on steel Pipelines & Welds	192.243	3 years	1210.010	641-6	K/S	K/S
E3	Repair of Steel Pipelines by Grinding	192.309 192.713 192.715	1 year	GS 1730.010, GS 3010.010		K	K
F1	Joining Plastic Pipe – Manual & Hydraulic → TO BE PERFORMED BY QUALIFIED INDIVIDUAL ONLY – DIRECT OBSERVATION NOT PERMITTED!	192.273 192.281 192.285 192.287	1 year ³	GS 1300.010, GS 1301.010, GS1302.010, GS 1304.010, GS 1306.010, GS 1308.010, GS 1310.010, GS 1320.010, GS 1323.010	640-3, 643-3, 643-4, 643-5, 643-10, 643-12, 644-2, 644-3, 644-4, 644-9, 644-12,	K/S	K/S

³ Twelve (12) months date specific for Columbia Gas of Kentucky, Columbia Gas of Maryland, and Columbia Gas of Pennsylvania. Twelve (12) months not to exceed fifteen (15) months for Columbia Gas of Ohio.

Exhibit A

Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill		
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method		
						Initial	Subsequent	
F1a	Joining Plastic Pipe – Manual Only → TO BE PERFORMED BY QUALIFIED INDIVIDUAL ONLY – DIRECT OBSERVATION NOT PERMITTED!	192.285 192.281 192.287 192.273	1 year ⁴	GS 1300.010, GS 1301.010, GS1302.010, GS 1304.010, GS 1306.010, GS 1308.010, GS 1310.010, GS 1320.010, GS 1323.010	640-3, 643-3, 643-4, 643-5, 643-10, 643-12, 644-2, 644-3, 644-4, 644-9, 644-12,	K/S	K/S	
F2	Joining Pipe with Mechanical Fittings	192.273 192.281 192.285 192.287	1 year ⁵	GS 1300.010, GS 1320.010 GS 1323.010	640-3, 643-3, 643-4 643-5, 643-10, 643-12	K/S	K/S	
F3	Joining and Repairing Polyvinyl Chloride Pipe	192.273 192.281 192.285 192.287	1 year ⁶	GS 1320.010, GS 1714.020	640-3, 643-3, 643-4, 643-5, 643-10,643-12, 651-6,	K/S	K/S	
G1	Excavation and Backfilling	192.614 192.317 192.319 192.325 192.327	3 years	GS 1100.010, GS 3010.040, GS 3010.050, GS 3010.080, GS 3010.090, GS 3010.100, GS 3010.102, GS 3010.104, GS 3010.106, HSE 4100.040	535-4, 640-1, 640-2, 659-2, 445-3,	K	K	

⁴ Twelve (12) months date specific for Columbia Gas of Kentucky, Columbia Gas of Maryland, and Columbia Gas of Pennsylvania. Twelve (12) months not to exceed fifteen (15) months for Columbia Gas of Ohio.

⁵ Twelve (12) months date specific for Columbia Gas of Kentucky, Columbia Gas of Maryland, and Columbia Gas of Pennsylvania. Twelve (12) months not to exceed fifteen (15) months for Columbia Gas of Ohio.

⁶ Twelve (12) months date specific for Columbia Gas of Kentucky, Columbia Gas of Maryland, and Columbia Gas of Pennsylvania. Twelve (12) months not to exceed fifteen (15) months for Columbia Gas of Ohio.

Exhibit A

Columbia Gas Covered Task List							Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method		
						Initial	Sub-sequent	
G2	Horizontal Directional Drilling	192.307 192.317 192.321 192.325 192.327 192.361 192.614	3 years	GS 1100.050, GS 3010.080, GS 3010.090, GS 3010.100, GS 3010.102, GS 3010.104,	640-1, 640-2	K	K	
G3	Other Boring Methods	192.307 192.317 192.321 192.323 192.325 192.327 192.361 192.614	3 years	GS 1100.050, GS 3010.080, GS 3010.090, GS 3010.100, GS 3010.104, GS 3010.106,	640-1, 640-2	K	K	
H1	Installing / Replacing / Repairing Meter & Regulator Sets	192.353 192.355 192.357 192.359 192.363 192.365 192.467	3 years	GS 1420.530, GS 3020.020, GS 3020.090, GS 6400.420, GS 6400.440, GS 6500.100	640-2, 653-4, 700-3, 724-5, 724-42, 724-44,	K/S	K/S	

Exhibit A

Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
H2	Installing / Replacing / Repairing Gas Service lines	192.287 192.307 192.321 192.361 192.365 192.367 192.369 192.375 192.379 192.381 192.703	3 years	GS 1100.050, GS 1420.410, GS 1680.020, GS 1680.040, GS 1680.050, GS 1714.020, GS 1730.010, GS 3000.020, GS 3010.010, GS 3010.020, GS 3010.040, GS 3010.050, GS 3010.060, GS 3010.070, GS 3010.080, GS 3010.090, GS 3010.100, GS 3010.102, GS 3010.104, GS 3010.106, GS 3020.010, GS 3020.020, GS 3020.030, GS 3020.050, GS 3020.090, GS 3020.100	535-4, 640-1, 640-2, 640-3, 640-10, 651-6, 445-3	K/S	K/S
H2a	Visual Inspection of Gas Lines	192.287 192.307 192.317 192.319 192.325 192.327 192.353 192.355 192.361 192.365 192.367 192.369 192.461 192.611	3 years	GS 1100.050, GS 1420.410, GS 1680.020, GS 1680.050 GS 1714.020, GS 1720.010 GS 3000.020, GS 3010.010, GS 3010.020, GS 3010.040, GS 3010.050, GS 3010.060, GS 3010.070, GS 3010.080, GS 3010.090, GS 3010.100, GS 3010.102, GS 3010.104, GS 3010.106, GS 3020.010, GS 3020.020, GS 3020.030, GS 3020.050, GS 3020.090,	535-5, 640-1, 640-2, 640-3, 651-6, 445-3	K/S	K/S

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Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
11	Application and Maintenance of Corrosion Control Systems Example: Corrosion Tech	192.455 192.457 192.459 192.461 192.463 192.465 192.467 192.469 192.471 192.473 192.475 192.477 192.479 192.481 192.483 192.485 192.487 192.489 192.490 192.609 192.611 192.613 192.705 192.706 192.721	3 years	GS 1410.010, GS 1420.020, GS 1420.030, GS 1420.035, GS 1420.040, GS 1420.050, GS 1420.070, GS 1420.080, GS 1420.090, GS 1420.095, GS 1420.100, GS 1420.105, GS 1420.120, GS 1420.410, GS 1420.420, GS 1420.430, GS 1420.440, GS 1420.510, GS 1420.520, GS 1420.530, GS 1420.540, GS 1420.550, GS 1420.580, GS 1430.010, GS 1430.020, GS 1430.030, GS 1430.110, GS 1430.120, GS 1430.130, GS 1430.140, GS 1430.210, GS 1430.220, GS 1430.230, GS 1430.240, GS 1430.250, GS 1430.310, GS 1430.320, GS 1430.322, GS 1430.324, GS 1430.330, GS 1430.410, GS 1440.010, GS 1440.020, GS 1440.022, GS 1450.010, GS 1460.010, GS 1460.020, GS 1640.020, GS 1702.010, GS 1704.010, GS 1708.022, GS 1708.040, GS 1730.010, GS 6500.190	535-4, 535-5, 535-8, 640-1, 640-2, 640-12 643-4, 645-1 651-10, 653-2, 653-3, 653-4, 653-6, 653-7, 653-8, 654-4, 656-1, 663-1, 721-2, 725-19	K/S	K/S

Exhibit A

Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
I1a	Evaluation and Application of Corrosion Control Example: Field Tech (plant)	192.455 192.457 192.459 192.461 192.463 192.465 192.467 192.469 192.471 192.473 192.475 192.477 192.479 192.481 192.483 192.485 192.487 192.489 192.705 192.721	3 years	GS 1410.010, GS 1420.035, GS 1420.040, GS 1420.050, GS 1420.410, GS 1420.510, GS 1420.520, GS 1420.530, GS 1420.540, GS 1420.580, GS 1430.020, GS 1430.030, GS 1430.110, GS 1430.250, GS 1440.010, GS 1450.010, GS 1460.010, GS 1460.020, GS 1702.010, GS 1704.010, GS 1708.040, GS 2200.020,	535-4, 535-5, 535-8, 640-1, 640-2, , 640-12, 643-4, 651-10, 653-2, 653-4, 653-6, 653-8, 654-4, 656-1, 663-1, 721-2, 725-19, JM 1320	K/S	K/S

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Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
I1b	Reading Test Stations & Evaluation and Application of Corrosion Control Example: Test station reader	192.455 192.457 192.459 192.461 192.465 192.469 192.471 192.473 192.475 192.477 192.479 192.481 192.705 192.721	3 years	GS 1410.010, GS 1420.035, GS 1420.040, GS 1420.050, GS 1420.410, GS 1430.030, GS 1430.110, GS 1440.010, GS 1450.010, GS 1460.010, GS 1460.020, GS 1702.010, GS 1704.010	535-8, 640-1, 645-1, 653-2, 653-4, 654-4 653-8, 656-1,	K/S	K/S
I1c	Evaluation and Application of Above Ground Corrosion Control Example: Service tech	192.465 192.479 192.481 192.705 192.721	3 years	GS 1440.010, GS 1450.010, GS 1702.010, GS 1704.010	535-8, 645-1, 653-4, 653-6, 654-4, 656-1,	K/S	K/S
I1d	Monitor Corrosion Control Methods / Patrolling & Surveillance Example: meter reader	192.465 192.481 192.705 192.721	3 years	GS 1450.010, GS 1702.010, GS 1704.010	N/A	K/S	K/S
L1	Tapping & Stopping Pipelines – all Sizes & Pressures → TO BE PERFORMED BY QUALIFIED INDIVIDUAL ONLY – DIRECT OBSERVATION NOT PERMITTED!	192.627	3 years	GS 1680.010, GS 1680.040, GS 1680.050,	640-1,640-2, 640-7, 640-10	K/S	K/S

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Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
L1a	Tapping & Stopping Pipelines - 4" & smaller tap hole size; 60 PSIG & less → TO BE PERFORMED BY QUALIFIED INDIVIDUAL ONLY – DIRECT OBSERVATION NOT PERMITTED!	192.627	3 years	GS 1680.010, GS 1680.040 GS 1680.050,	640-1, 640-2, 640-7, 640-10	K/S	K/S
L1b	Tapping & Stopping Pipelines - Self Punch Tees / LP Tapping and Bagging → TO BE PERFORMED BY QUALIFIED INDIVIDUAL ONLY – DIRECT OBSERVATION NOT PERMITTED!	192.627	3 years	GS 1680.010, GS 1680.040 GS 1680.050,	640-1, 640-2, 640-7	K/S	K/S
L1c	Tapping & Stopping Pipelines – Self Punch Tees	192.627	3 years	GS 1680.010, GS 1680.040 GS 1680.050,	640-1, 640-2, 640-7	K/S	K/s
L2	Purging Pipelines (No Restrictions)	192.629	3 years	GS 1690.010, GS 1690.020	640-8	K/S	K/S
L2a	Purging Pipelines (Service Lines & Meter Sets)	192.629	3 years	GS 1690.010	640-8	K/S	K/S
L3	Operating / Maintaining Odorization Equipment	192.625	3 years	GS 1670.010, GS 1670.020, GS 1670.030	651-5, 660-2, 721-6, 721-8	K/S	K/S
L3a	Operating / Maintaining / Monitoring Farm Tap Odorizers & Odorant Levels	192.625	3 years	GS 1670.010, GS 1670.020, GS 1670.030	651-5, 660-2, 721-6, 721-8	K/S	K/S
L3b	Monitoring Odorant Levels	192.625	3 years	GS 1670.020, GS 1670.020	651-5, 660-2, 721-6, 721-8	K/S	K/S
L4	Gas Control – Controlling and Monitoring Gas pressure and flows; Monitoring Odorization Levels; and AOC's	192.603 192.605 192.615 192.619 192.621 192.623 192.625 192.631	1 year ⁷	GS 1660.020, GS 1754.010,		K	K

⁷ One year not to exceed 15 months per 192.631

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Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Sub-sequent
M1	Perform Leak Survey, Classification & Patrolling Example: Leak Inspector	192.613 192.615 192.703 192.705 192.706 192.721 192.723	3 years	GS 1702.010, GS 1704.010 GS 1100.020, GS 1708.010, GS 1708.020, GS 1708.022, GS 1708.030, GS 1708.040, GS 1708.050, GS 1708.060, GS 1708.070, GS 1708.080, GS 1714.010, GS 1714.030, GS 1714.040, GS 1714.060, GS 1780.010 Damage Prevention Plan	640-11, 642-1 645-1, 651-2, 651-3, 651-4, 651-5, 651-6, 651-8, 651-9, 651-12, 663-1, 721-2, 721-4, 721-5, 721-7,	K/S	K/S
M1a	Leak Classification & Patrolling Example: Field (plant) and/or Service Tech.	192.613 192.615 192.703 192.705 192.706 192.721 192.723	3 years	GS 1702.010, GS 1704.010 GS 1708.010, GS 1708.020, GS 1708.022, GS 1708.030, GS 1708.040, GS 1708.060, GS 1708.070, GS 1708.080, GS 1714.010, GS 1714.030, GS 1714.060, Damage Prevention Plan	645-1, 659-3 651-2, 651-3, 651-4, 651-5, 663-1, 651-8, 721-2, 721-4, 721-5, 721-7,	K/S	K/S
M2	Locate and Mark Underground Facilities	192.614 192.707	3 years	Damage Prevention Plan, GS 1100.010, GS 1100.020, GS 1100.100, REF GS 1100.010,	640-11, 659-1, 659-2, 659-3 659-5(34)	K/S	K/S
M2A	Verifying Facility Location for Company Purpose	192.614	3 years	GS 1708.055	n/a	K/S	K/S
M3	Pressure Testing Pipelines	192.503 192.505 192.507 192.509 192.511 192.513 192.719 192.725	3 years	GS 1500.010, , GS 6500.030, GS 6500.040, GS 6500.050	640-1, 640-2, 640-5, 725-3, 725-4, 725-5	K/S	K/S

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Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill		
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method		
						Initial	Subsequent	
*M4 is a progression task; the subparts of M-4 are stand-a-lone tasks. There is no collateral credit contained within the subparts of M-4								
*M4	Inspect & Test Pressure Limit Stations, Relief Devices & Pressure Regulating Stations <i>After an employee has been OQ qualified and it is time for subsequent re-qualification, he/she is then re-qualified on task M-4 which contains all of the sub parts using module, GDS 6.18 Identifying Equipment and Practice Basic to Gas Regulation Systems</i>	192.731 192.739 192.741 192.743 192.749 192.619 192.621 192.623	3 years	GS 1750.010, GS 1750.020, GS 1750.040, GS 1750.050, GS 1750.210, GS 1750.810, GS 1752.010, GS 1754.010, GS 1756.010, GS 1762.010,	654-3, 654-4, 654-5, 654-6, 654-10, 654-8, 654-10, 724-9, 724-11	K/S	K/S	
*M4a	Adjusting Pressure at Regulator Stations & Operating a By-Pass <i>Training and initial qualification utilizing module, GDS 5.2 Adjusting Pressure at Regulator Stations & Operating a By-Pass. Or GDS 6.4 Performing Basic Maintenance Operation on Self-Operated Regulator Installations</i>	192.739 192.619 192.621 192.623	3 years	GS 1750.010, GS 1750.020, GS 1750.040, GS 1750.050, GS 1752.010, GS 1754.010, GS 1756.010	654-3, 654-4, 654-10,	K/S	K/S	
*M4b	Reading and Changing Charts <i>Training and initial qualification utilizing module, GDS 6.7 Reading Multiply Range Recording Chart</i>	192.743 192.619 192.621 192.741 192.739	3 year	GS 1750.010, GS 1750.020, GS 1750.040, GS 1750.050, GS 1752.010, GS 1754.010, GS 1756.010	654-3, 654-4, 654-10,	K/S	K/S	

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Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
*M4c	<p>Operating & Maintaining Self-Operated Pressure Regulators</p> <p><i>Training and initial qualification utilizing module, GDS 6.10 Operating & Maintaining Self-Operated Pressure Regulators</i></p> <p>To work on <u>Self-Operated</u> regulators the employee must first complete modules GDS6.7 (M-4b) & GDS6.4 Performing Basic Maintenance Operation On Self-Operated Regulator Installations.</p>	<p>192.619 192.749 192.621 192.739 192.741 192.743</p>	3 years	<p>GS 1750.010, GS 1750.020, GS 1750.040, GS 1750.050, GS 1754.010, GS 1754.810, GS 1750.210, GS 6400.090, GS 6400.110</p>	<p>654-3, 654-4, 654-5, 654-6, 654-8, 654-10, 724-9, 724-11</p>	K/S	K/S
*M4d	<p>Operating & Maintaining Pilot-Operated Pressure Regulators</p> <p><i>Training and initial qualification utilizing module, GDS 6.11 Identifying Operating Characteristics of Pilot-Operated Pressure Regulators</i></p> <p>To work on <u>Pilot Operated</u> regulators the employee must complete modules GDS6.4 Performing Basic Maintenance Operation On Self-Operated Regulator Installations, GDS6.7 (M-4b), GDS6.10 (M-4c), and GDS6.11 (M-4d)</p>	<p>192.743 192.619 192.749 192.621 192.739 192.741</p>	3 years	<p>GS 1750.010, GS 1750.040, GS 1750.050, GS 1754.010, GS 1754.810, GS 1750.210(XX) GS 6400.090, GS 6400.110</p>	<p>654-3, 654-4, 654-5, 654-6, 654-8, 654-10 724-9, 724-11</p>	K/S	K/S

Exhibit A

Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
*M4e	<p><u>Operating & Maintaining Instrument Controllers</u></p> <p><i>Training and initial qualification utilizing module, GDS 6.16 Identifying Fundamental Principles and Application of Instrument Controllers</i></p> <p>To work on <u>Instrument Controllers</u> the employee must complete modules GDS6.4 Performing Basic Maintenance Operation On Self-Operated Regulator Installations, GDS6.7 (M-4b), GDS6.10 (M-4c), and GDS6.16 (M-4e)</p>	<p>192.743 192.619 192.749 192.621 192.739 192.741</p>	3 years	<p>GS 1750.010, GS 1754.010, GS 1754.810, GS 1750.210(XX) GS 6400.090, GS 6400.110</p>	<p>654-3, 654-4, 654-5, 654-6, 654-8, 654-10, 724-9, 724-11</p>	K/S	K/S
*M4f	<p><u>Operating & Maintaining Transducers and Bristol Controllers</u></p> <p><i>Training and initial qualification utilizing module, GDS 6.17 Identifying Maintenance and Operation Procedures for Transducers and Bristol Controllers</i></p> <p>To work on <u>Transducers and Bristol Controllers</u> the employee must complete modules GDS6.4 Performing Basic Maintenance Operation On Self-Operated Regulator Installations, GDS6.7 (M-4b), GDS6.10 (M-4c), and GDS6.17 (M-4f)</p>	<p>192.743 192.619 192.749 192.621 192.739 192.741</p>	3 years	<p>GS 1750.010, GS 1754.010, GS 1754.810, GS 1750.210(XX) GS 6400.090, GS 6400.110</p>	<p>654-3, 654-4, 654-5, 654-6, 654-8, 654-10, 724-9, 724-11</p>	K/S	K/S
M4h.1	<p><u>Inspecting and Lighting Catalytic Heaters</u></p> <p>This task supports non-M4 qualified employees inspecting and lighting catalytic heaters.</p>	<p>192.739</p>	3 years	<p>GS 1750.210</p>	n/a	K	K

Exhibit A

Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
M5	Maintenance & Repair Line Valves and Critical Valve Inspection	192.179 192.745 192.747 192.181	3 years	GS 1760.010, GS 2400.010, GS 2400.020,	652-1, 652-2(32)	K/S	K/S
M5a	Critical Valve Inspection	192.745 192.747 192.325 192.327	3 years	GS 1760.010, GS 2400.010, GS 2400.020	652-1, 640-2, 652-2(32), 445-3	K/S	K/S
M7	Preventing & Responding to Potentially Hazardous Situations	192.615 192.751 192.614	3 years	GS 1150.003, GS 1150.005, GS 1150.010, GS 1150.020, GS 1150.030, GS 1150.050, GS 1150.060, GS 1150.070, GS 1150.080, GS 1150.090, GS 1150.100, GS 1150.200, GS 1714.010,	511-2, 511-3, 640-11, 651-5	K	K
M7a	Preventing Accidental Ignition	192.614 192.615 192.751	3 years	GS 1150.005, GS 1150.010,		K	K

Exhibit A

Columbia Gas Covered Task List						Qualification methods: K = Knowledge only S = Skill only K/S = Knowledge & Skill	
Task	Description	DOT References	Interval	Gas Standard (GS)	Legacy P/P references	Qualification Method	
						Initial	Subsequent
M8	Install / Replace / Repair Mains & Transmission Lines	192.307 192.309 192.311 192.317 192.319 192.321 192.323 192.325 192.327 192.605 192.703 192.711 192.713 192.715 192.717	3 years	GS 1100.050, GS 1420.410, GS 1460.010, GS 1680.020, GS 1680.040, GS 1680.050, GS 1714.020, GS 1720.010, GS 1730.010, GS 3000.010, GS 3000.020, GS 3000.100 GS 3010.010, GS 3010.020, GS 3010.030, GS 3010.040, GS 3010.050, GS 3010.060, GS 3010.070, GS 3010.080, GS 3010.090, GS 3010.100, GS 3010.102, GS 3010.104, GS 3010.106,	535-4, 539-9, 614-4, 640-1, 640-2, 640-3, 640-10, 651-6, 651-10, 445-3	K/S	K/S
M9	Repair / Protect Cast Iron Pipe	192.275 192.753 192.755	3 years	GS 1460.010, GS 1714.020, GS 1780.010, GS 1782.010, GS 3020.030,	642-1, , 651-6, 651-10	K/S	K/S
M10	Abandon Gas Piping / Discontinue Service	192.727 192.379	3 years	GS 1740.010GS 1742.010, GS 3020.090,	640-1, 640-2, 725-8,	K/S	K/S
M10a	Discontinue Gas Service	192.727 192.379	3 years	GS 1740.010(xx) GS 1742.010, GS 3020.090,	725-8	K/S	K/S

Exhibit B

Subsequent Qualification Intervals

Task	Description	Interval
A1	Operating / Maintaining Propane Air Facilities	Annual
A1a	Operating Propane Air Facilities	Annual
D1 ⁸	Compressor Stations	
E1	Welding Pipelines	6 month test (arc weld) 1 year test (all processes) 2 year test (all processes)
E1a	Visual Inspection of Welds	3 rd calendar year
E2	Perform Nondestructive Testing on Steel Pipelines & Welds	3 rd calendar year
E3	Repair of Steel Pipelines by Grinding	Annual
F1	Joining Plastic Pipe – Manual & Hydraulic	Annual
F1a	Joining Plastic Pipe – Manual Only	Annual
F2	Join Pipe with Mechanical Fittings	Annual
F3	Joining and Repairing Polyvinyl Chloride (PVC) Pipe	Annual
G1	Excavating and Backfilling	3 rd calendar year
G2	Horizontal Directional Drilling	3 rd calendar year
G3	Other Boring Methods	3 rd calendar year
H1	Installing / Replacing / Repairing Meter and Regulator Sets	3 rd calendar year
H2	Installing / Replacing / Repairing Gas Service Lines	3 rd calendar year
H2a	Visual Inspection of Gas Lines	3 rd calendar year
I1	Application and Maintenance of Corrosion Control Systems	3 rd calendar year
I1a	Evaluation and Application of Corrosion Control	3 rd calendar year
I1b	Reading Test Stations & Evaluation and Application of Corrosion Control	3 rd calendar year
I1c	Evaluation and Application of Above Ground Corrosion Control	3 rd calendar year
I1d	Monitor Corrosion Control Methods / Patrolling & Surveillance	3 rd calendar year
L1	Tapping & Stopping Pipelines – all Sizes & Pressures	3 rd calendar year
L1a	Tapping & Stopping Pipelines – 4” and smaller tap hole / 60 PSIG and less	3 rd calendar year
L1b	Tapping & Stopping Pipelines - Self Punch Tees & Low Pressure Bagging	3 rd calendar year
L1c	Tapping & Stopping Pipelines – Self Punch Tees	3 rd calendar year
L2	Purging Pipelines – No Restrictions	3 rd calendar year
L2a	Purging Pipelines – Service Lines & Meter Sets	3 rd calendar year
L3	Operating / Maintaining Odorization Equipment	3 rd calendar year
L3a	Operating / Maintaining / Monitoring Farm Tap Odorizers & Odorant Levels	3 rd calendar year
L3b	Monitoring Odorant Levels	3 rd calendar year
L4	Gas Control – Controlling and Monitoring Gas pressure and flows; Monitoring Odorization Levels; and AOC's	Annual
M1	Perform Leak Survey, Classification & Patrolling	3 rd calendar year
M1a	Leak Classification & Patrolling	3 rd calendar year
M2	Locate and Mark Underground Facilities	3 rd calendar year
M2a	Verifying Facility Location for Company Purpose	3 rd calendar year

⁸ This is a place holder only; at this time Columbia does not operate or maintain any compressor stations.

Exhibit B

M3	Pressure Testing Pipelines	3 rd calendar year
M4	Inspect and Test Pressure Limit Stations, Relief Devices and Pressure Regulating Stations	3 rd calendar year
M4a	Adjusting Pressure at Regulating Stations and Operating a By-Pass	3 rd calendar year
M4b	Reading and Changing Charts	3 rd calendar year
M4c	Operating and Maintaining Self-Operated Pressure Regulators	3 rd calendar year
M4d	Operating and Maintaining Pilot-Operated Pressure Regulators	3 rd calendar year
M4e	Operating and Maintaining Instrument Controllers	3 rd calendar year
M4f	Operating and Maintaining Transducers and Bristol Controllers	3 rd calendar year
M4h.1	Inspecting and Lighting Catalytic Heaters	3 rd calendar year
M5	Maintenance & Repair Line Valves and Critical Valve Inspection	3 rd calendar year
M5a	Critical Valve Inspection	3 rd calendar year
M7	Prevention & Responding to Potentially Hazardous Situations	3 rd calendar year
M7a	Preventing Accidental Ignition	3 rd calendar year
M8	Install / Replace / Repair Mains & Transmission Lines	3 rd calendar year
M9	Repair / Protect Cast Iron Pipe	3 rd calendar year
M10	Abandon Gas Piping / Discontinue Services	3 rd calendar year
M10a	Discontinue Gas Service	3 rd calendar year

Exhibit B

Subsequent Qualification Interval Matrix

Assign a value (ranging from 1 to 5) to each of the three qualifying categories. **Critical nature** refers to how serious the consequences would be if the task was done improperly (1 = minor 5 = catastrophic). **Complexity** refers to how complex a task is to perform. Complex tasks have a score of 5 and simple tasks have a score of 1. **Frequency** refers to how often the task is performed. Frequently performed tasks have a score of 1, while infrequently performed have a score of 5. The **total** of the three columns will identify the requalification interval.

*If the **total** Score (X) is*
< 6 = 60 Fifth calendar year
≥ 6 but <10 = Third calendar year
≥10 but <16 = 12 months

Columbia Covered Task and Description	CRITICAL NATURE	COMPLEXITY	FREQUENCY	TOTAL	Re-evaluation Interval
A1 Operating / Maintaining Propane Air Facilities	Statutory	192.11	NFPA 58 & 59	NA	Annual
A1a Operating Propane Air Facilities	Statutory	192.11	NFPA 58 & 59	NA	Annual
D1 Compressor Stations ⁹					
E1 Welding Pipelines	Statutory	192.227	API 1104	NA	6-month arc test 1 year all processes 2 year all processes
E1a Visual Inspection of Welds	1	1	3	5	5 years
E2 Perform Nondestructive Testing on Steel Pipelines & Welds	1	5	1	7	3 years
E3 Repair of Steel Pipelines by Grinding	4	2	5	11	Annual
F1 Joining Plastic Pipe – Manual & Hydraulic	Statutory	192.285	NA	NA	Annual
F1a Joining Plastic Pipe – Manual Only	Statutory	192.285	NA	NA	Annual
F2 Joining Pipe with Mechanical Fittings	Statutory	192.285	NA	NA	Annual
F3 Joining and Repairing Polyvinyl Chloride (PVC) Pipe	Statutory	192.285	NA	NA	Annual
G1 Excavating and Backfilling	3	3	1	7	3 years
G2 Horizontal Directional Drilling	3	2	3	8	3 years
G3 Other Boring Methods	3	2	3	8	3 years
H1 Installing / Replacing / Repairing Meter and Regulator Sets	3	3	1	7	3 years

⁹ This is a place holder only; at this time Columbia does not operate or maintain any compressor stations.

Exhibit B

Columbia Covered Task and Description	CRITICAL NATURE	COMPLEXITY	FREQUENCY	TOTAL	Re-evaluation Interval
H2 Installing / Replacing / Repairing Gas Service Lines	3	3	1	7	3 years
H2a Visual Inspection of Gas Lines	1	1	1	3	5 years
I1 Application and Maintenance of Corrosion Control Systems	3	4	1	8	3 years
I1a Evaluation and Application of Corrosion Control	3	4	1	8	3 years
I1b Reading Test Stations & Evaluation and Application of Above Ground Corrosion Control	3	2	2	7	3 years
I1c Evaluation and Application of Above Ground Corrosion Control	3	2	2	7	3years
I1d Monitor Corrosion Control Methods / Patrolling & Surveillance	2	2	2	6	3 years
L1 Tapping & Stopping Pipelines – All Sizes & Pressure	3	3	3	9	3 years
L1a Tapping & Stopping Pipelines – 4” and smaller tap holes / 60 PSIG & less	3	3	3	9	3 years
L1b Tapping & Stopping Pipelines - Self Punch Tees / Low Pressure Bagging	3	3	2	8	3 years
L1c Tapping & Stopping Pipelines – Self Punch Tees	3	1	1	5	5 years
L2 Purging Pipelines – No Restrictions	5	3	1	9	3 years
L2a Purging Pipelines – Service Lines and& Meter Sets	3	1	1	5	5 years
L3 Operating / Maintaining Odorization Equipment	3	3	1	7	3 years
L3a Operating / Maintaining / Monitoring Farm Tap Odorizers & Odorant Levels	3	2	3	8	3 years
L3b Monitoring Odorant Levels	1	1	1	3	5 years
L4 Gas Control – Controlling and Monitoring Gas pressure and flows; Monitoring Odorization Levels; and AOC's	Statutory	192.631	N/A	N/A	Annual
M1 Perform Leak Survey, Classification & Patrolling	3	3	1	7	3 years

Exhibit B

Columbia Covered Task and Description	CRITICAL NATURE	COMPLEXITY	FREQUENCY	TOTAL	Re-evaluation Interval
M1a Leak Classification & Patrolling	5	3	1	9	3 years
M2 Locate and Mark Underground Facilities	3	3	1	7	3 years
M2a Verifying Facility Location for Company Purpose	3	3	1	7	3 years
M3 Pressure Testing Pipelines	3	3	3	9	3 years
M4 Inspect and Test Pressure Limit Stations, Relief Devices and Pressure Regulating Stations	3	5	1	9	3 years
M4a Adjusting Pressure at Regulating Stations and Operating a By-Pass	3	3	3	9	3 years
M4b Reading and Changing Charts	3	3	3	9	3 years
M4c Operating and Maintaining Self-Operated Pressure Regulators	3	3	1	7	3 years
M4d Operating and Maintaining Pilot-Operated Pressure Regulators	3	3	3	9	3 years
M4e Operating and Maintaining Instrument Controllers	3	3	3	9	3 years
M4f Operating and Maintaining Transducers and Bristol Controllers	3	3	3	9	3 years
M4h.1 Inspecting and Lighting Catalytic Heaters	3	2	3	8	3 years
M5 Maintenance & Repair Line Valves & Critical Valve Inspection	3	3	3	9	3 years
M5a Critical Valve Inspection	3	2	3	8	3 years
M7 Preventing & Responding to Potentially Hazardous Situations	5	3	1	9	3 years
M7a Preventing Accidental Ignition	5	3	1	9	3 years
M8 Install / Replace / Repair Mains & Transmission Lines	3	3	1	7	3 years
M9 Repair / Protect Cast Iron Pipe	3	3	3	9	3 years
M10 Abandon Gas Piping / Discontinue Service	3	3	1	7	3 years
M10a Discontinue Gas Service	1	1	1	3	5 years

Exhibit C

CONTRACTOR OPERATOR QUALIFICATION REQUIREMENTS

1. Contractor shall provide and maintain, as required by Columbia Gas, a written plan identifying Contractor's DOT Operator Qualification program. This program must meet or exceed all requirements as outlined in 49 CFR PART 192 SUBPART N and receive Columbia Gas approval for the written plan and any subsequent modifications to the plan.
2. Contractor shall supply to Columbia Gas an electronic copy of its written Operator Qualification plan and any modifications or changes thereto, as well as any required employee qualification records. This information shall be used by Columbia Gas to verify Contractor compliance with 49 CFR 192 SUBPART N as may be required by federal and state audits, or other governmental authority requests. If the Contractor's failure to comply results in a fine and or penalty, the Contractor will be responsible for all associated monetary cost, including reimbursement to Columbia Gas of any fines or penalties incurred by Columbia Gas as a result of or arising out of the Contractor's Operator Qualification plan.
3. Contractor shall be allowed to utilize Individuals who are not qualified to perform a covered task as long as a qualified individual directly observes the performance and is able to take immediate corrective action when necessary as outlined in Section C of this plan. Columbia reserves the right to limit the time a person can perform a covered task before receiving the necessary qualifications. Columbia reserves the right to limit the ratio of nonqualified to qualified employees performing covered task(s) on Columbia Gas facilities.
4. Contractor's employees shall have with them at all times wallet cards or other acceptable means of providing a list of their personal qualifications while performing covered task(s) on Columbia Gas facilities.
5. Contractor shall provide Columbia, immediately, any changes that are made regarding Contractor's written plan, or changes in an employee's qualification status to perform covered task(s) on Columbia Gas facilities.
6. Contractor, upon request, shall provide any information requested by Columbia Gas regarding Contractor's compliance with Operator Qualification requirements.
7. Contractor's method used to evaluate an employee's ability to perform a covered task(s) on Columbia Gas facilities must receive Columbia Gas approval prior to Contractor performing any services under any agreement (3rd party qualifying, Contractor evaluation program, or other). Columbia Gas does not accept work performance history as an acceptable evaluation method by the Contractor. Columbia Gas does not accept computer-based/video qualification testing as the sole method of qualification. Columbia Gas will only accept qualification methods utilizing an Operator approved validated curriculum, administered by individuals that have successfully completed an Operator approved qualifier program. Contractor's employees must achieve a minimum score of 80% to be qualified for each Covered Task.
8. Contractor shall maintain adequate records, including an employee's qualification records, as prescribed in 49 CFR 192.807 and Sec. J of this plan. Columbia Gas shall be granted access to Contractor's records, including the written plan and employee records. This access shall be for as long as Contractor's employee continues to perform covered tasks on Columbia Gas facilities, and for a period of at least five (5) years after an employee no longer performs covered task(s) on Columbia Gas facilities. Monthly submission of contractor employees OQ records is required.
9. Contractor's employee's qualification records shall include: Identification of the qualified individual; Identification of the covered task(s) the individual is qualified to perform; Date(s) of current

Exhibit C

qualification; Qualification method(s); and must identify to company, individual or 3rd party that performed the evaluation.

- 10. Qualification records supporting an individual’s current qualification shall be maintained as prescribed in section 192.807 – Record keeping (five years from the date an individual last performed any identified covered task). Contractors will make monthly submission of qualification records to Compliance Specialists specific to the state in which work is being performed.
- 11. Sub-Contractors - If a contractor requires the services of a sub-contractor to perform an identified covered task(s) the contractor must first obtain approval from Columbia Gas’s OQ Administrator, through communication with the state specific Compliance Specialist. The sub-contractor will be required to meet or exceed all Federal, State and Columbia Gas OQ requirements prior to the performance of any identified covered task(s) on Columbia’s facilities. Non-qualified individuals working for a sub-contractor will be allowed to perform identified covered task(s) under the direct observation and responsibility of a qualified individual in accordance with Section C of this plan.

CONTRACTOR EVALUATION REQUIREMENTS

Qualifications can be administered by an approved third party provider or the Contractor may administer qualifications. Self-administered qualifications are valid only with prior approval from Columbia and only when using a NiSource Gas Distribution materials and NiSource approved proctor/evaluator and OQ program. Exceptions¹⁰ to this option may be approved on a case-by-case basis and will require written authorization by the NiSource OQ Administrator prior to any identified covered task(s) being performed on Columbia Gas facilities including facilities.

Approved Third Party OQ Evaluation Providers

CDC has established the following companies as current approved OQ Providers for DOT 192 subpart N, evaluations:

Approved Third Party Providers	
<p>ARC Randolph Associates, LLC 4017 Washington Road, Suite 175 McMurray, PA 15317 Phone(859) 543-0224 (412) 580-8668 donna.nedelk@arcrandolph.com www.arcrandolph.com</p>	<p>Bluegrass Instructional Services Chris Sligh 3438 McClure Road Winchester, KY 40391 Phone (859) 494-3173 / Fax (859) 744-9974</p>
<p>Bowman Consulting (formerly CTSi) 9813 Godwin Drive Manassas, VA 20110 Phone (703) 530-8093 ext. 3029 / Cell (703) 400-1360</p>	<p>JANX (formerly Avalanche and T, Inc.) Al Welker Phone (609) 578-2043 al.welker@applusrtd.com</p>
<p>Premier Utility Services – specializing in leak survey and locating 100 Marcus Blvd. Suite 3; Hauppauge, NY 11788 Phone: 1-800262-8600 e-mail: wgorman@premeirsvc.com</p>	<p>Professional Utility Resources (PUR) P.O. Box 31794 Independence, Ohio 44131 Phone (216) 870-2707</p>

¹⁰ Exception to NGD materials can be found in the “Approved OQ Programs” section located on the next page.

Exhibit C

Approved Third Party Providers
Utility Technologies International Corporation (UTI) 4700 Homer Ohio Lane. Groveport, Ohio 43125 Phone (614) 482-8080 / Fax (614) 482-8070

Approved OQ Programs and Material

CDC has established the following Programs as current approved for DOT 192 subpart N, evaluations: NiSource Gas Distribution, Midwest Energy Association (MEA), Industrial Training Services (ITS) and Northeast Gas Association (NGA). CGV will only accept qualifications performed and certified by approved third party OQ providers utilizing NiSource Gas Distribution modules.

Exceptions to these options may be approved on a case-by-case basis and will require written authorization by the NiSource OQ Administrator prior to any identified covered task(s) being performed on Columbia Gas facilities. Examples under consideration for exception are, but not limited to, underwater pipeline operations, specialized pipe lining operations, nondestructive testing of steel welds and manufacturer training and evaluation.

Exhibit C

Contractor OQ Review/Approval Process

Prior to Contract Bid	
1	Group letting contract determines the covered tasks that will be performed by the contractor (rely on input from the OQ Administrator for input on covered task(s) based on scope of work for the contract being bid.)
2	Exhibit C and additional OQ guidance material are packaged for distribution to contractors for the pre-bid meeting

Prior to Contract Award	
1	Contractor submits OQ plan for Company review and approval <ul style="list-style-type: none"> ❑ OQ Administrator reviews contractor’s written OQ Plan language as submitted ❑ Columbia OQ Plan language applied to contractor’s plan ❑ Deficiencies identified and addressed ❑ Contractor’s Plan reviewed for potential restrictions placed on Columbia. ❑ Ensure contractor’s plan addresses validation methods for Evaluators and Evaluations ❑ Columbia’s task list is identified within contractor’s plan ❑ Protocol applied to ensure plan meets Columbia Gas needs and regulatory requirements
2	Plan returned to the contractor with changes (if any)
3	OQ Administrator addresses any contractor questions/concerns pertaining to OQ plan approval

Notification of Affected Parties	
1	OQ Administrator receives revised contractor OQ plan for final review/approval and notifies contractor of acceptance
2	Responsible Columbia Gas group notified of acceptance of the contractor OQ plan
3	Contractor and responsible Columbia Gas group advised that the contractor’s evaluation materials, record keeping and field operations, will be audited to ensure compliance.

Exhibit C

Contractor OQ Review/Approval Process

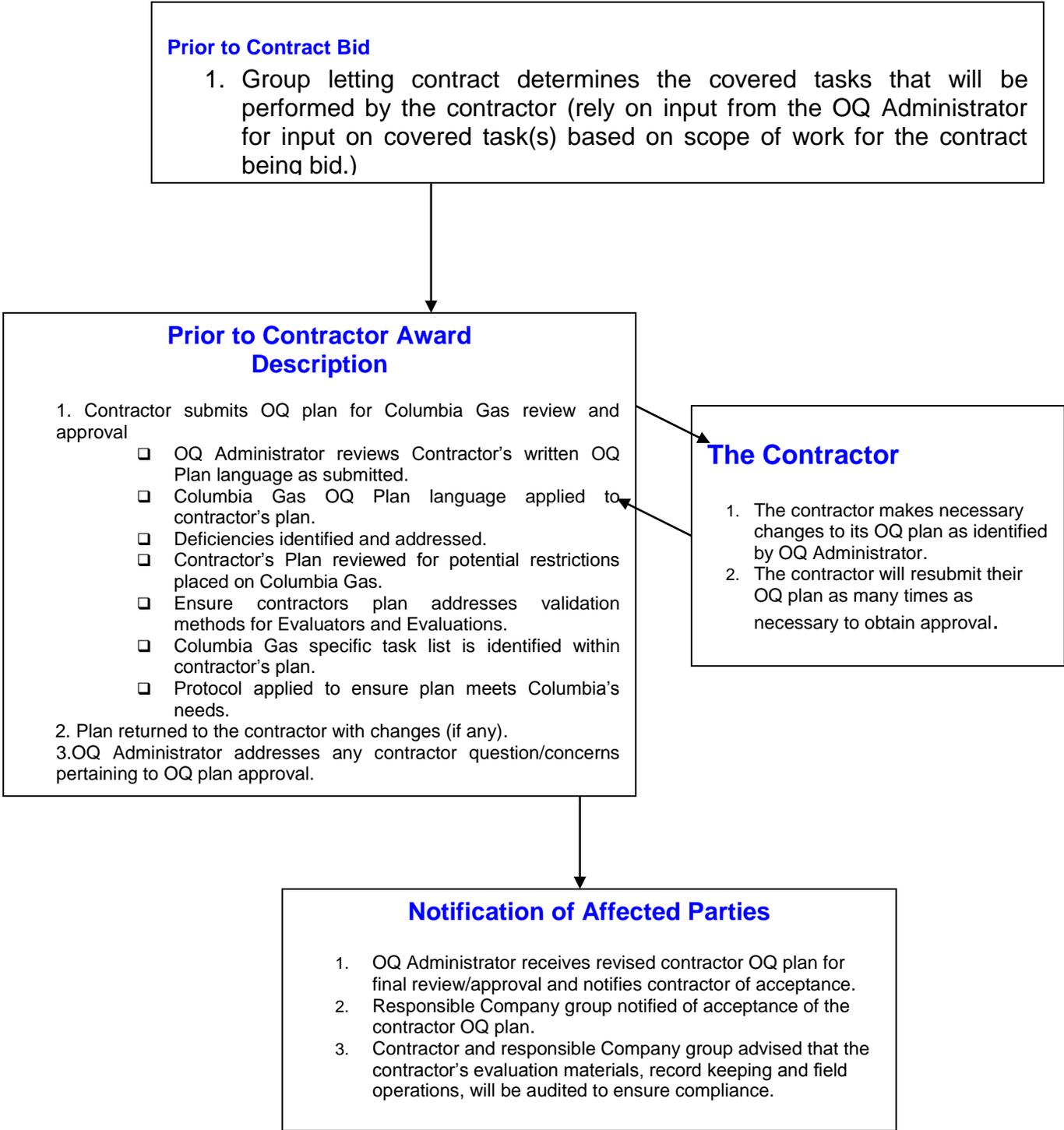


Exhibit D

Protocol for Evaluating Operator/Contractor OQ Plan Written Plan – 49 CFR 192, Subpart N

Name of Operator/Contractor:		Date Submitted:	
Representative responsible for the plan:	Plan reviewed and accepted by PS&C: Name: _____ Date: _____		
Have the following categories been addressed	YES	NO	COMMENTS
WRITTEN PLAN Is there a written plan in place?			
COVERED TASKS Have they identified covered tasks using the following criteria? <ul style="list-style-type: none"> • Performed on a pipeline • Operation or maintenance task • Affects operation/integrity of the pipeline • Required under 49 CFR 192 			
EVALUATION PROCESS Have they ensured, through evaluations, that individuals performing the covered tasks are qualified. <ul style="list-style-type: none"> • Written exam • Oral exam • Observation of performance on the job • On the job training • Simulations • Other forms of assessment 			
EVALUATION PROCESS Have they established criteria around: <ul style="list-style-type: none"> • Transitional qualification – (1) who performed covered tasks on regular basis prior to August 27, 1999 and (2) who is qualified to perform those same covered tasks according to the criteria above prior to October 28, 2002. • Initial qualification – Did not perform covered tasks prior to August 27, 1999. • Subsequent qualification – after transitional or initial qualification and after October 28, 2002. 			

Exhibit D

Name of Operator/Contractor:		Date Submitted:	
Representative responsible for the plan:	Plan reviewed and accepted by PS&C: Name: _____ Date: _____		
Have the following categories been addressed	YES	NO	COMMENTS
<p>NON QUALIFIED INDIVIDUAL</p> <p>Have they established criteria for non-qualified individuals to perform a covered task? Does it meet the minimum criteria of;</p> <ul style="list-style-type: none"> • Qualified individual assigned to direct & observe during the task • Qualified individual is able to take immediate corrective actions • Qualified individual is responsible for the performance of the task • Qualified individual can communicate effectively with the non-qualified individual • Ratio of non-qualified individuals is kept to a safe minimum 			
<p>PERFORMANCE CONTRIBUTING TO AN INCIDENT</p> <p>Have they established criteria around performance contributing to an incident, including;</p> <ul style="list-style-type: none"> • Provision to evaluate an individual if Columbia (the Operator) has reason to believe the individual's performance of a covered task contributed to an incident. • Process to determine whether an individual needs to be reevaluated. 			
<p>REASONABLE CAUSE TO VERIFY QUALIFICATIONS</p> <p>Are there provisions to evaluate an individual if there is reason to believe he/she is no longer qualified to perform the covered task? Reasons could include but are not limited to;</p> <ul style="list-style-type: none"> • Absenteeism • Loss of motor skills, vision, impairment, etc. • Statements from the individual • Prolonged period of non-performance • Unsatisfactory performance • Upon request 			

Exhibit D

Name of Operator/Contractor:		Date Submitted:	
Representative responsible for the plan:	Plan reviewed and accepted by PS&C: Name: _____ Date: _____		
Have the following categories been addressed	YES	NO	COMMENTS
<p>COMMUNICATE CHANGES</p> <p>Are there provisions to communicate changes that affect covered tasks to individual performing the task? Changes could be but are not limited to;</p> <ul style="list-style-type: none"> • Significant changes in policies or procedures • Changes in state or federal regulations • Use of new equipment/technology that affects the task. • New information from equipment or product manufacturers that significantly affects the task. <p>The levels of communications should be based on the severity of the changes, for instance;</p> <ul style="list-style-type: none"> • Limited impact - no communication • Moderate impact – communication only • Significant impact – communication & modification of the qualification process 			
<p>SUBSEQUENT QUALIFICATION INTERVALS</p> <p>What method did they use to determine the evaluation and qualification intervals for their covered tasks?</p>			
<p>RECORD KEEPING</p> <p>Does the record system used maintain information for the following data points and retain that information for a minimum of five (5) years?</p> <ul style="list-style-type: none"> • Identity of the covered tasks(s) and related subsequent qualification interval(s) • Identification of the evaluator • Evaluation method(s) used • Identification of the individual being qualified • Date(s) on which the qualification was completed • Qualification method(s) 			

Exhibit D

Name of Operator/Contractor:		Date Submitted:	
Representative responsible for the plan:	Plan reviewed and accepted by PS&C: Name: _____ Date: _____		
Have the following categories been addressed	YES	NO	COMMENTS
TRAINING Does their plan have provide provision around; <ul style="list-style-type: none"> • Training required for new employees • Training for employees taking on a new task(s) • Training for employees who fail an evaluation(s) • Training as required for new technology, equipment, materials, statutory requirements, etc. 			

Exhibit D

Gap Analysis for Evaluating Operator/Contractor OQ Covered Tasks

OPERATOR/CONTRACTOR INFORMATION

Name of Operator/Contractor: _____

Operator/Contractor Representative's Name: _____

Phone: _____ E-mail: _____

OQ Program used (i.e. MEA, ITS, etc.) _____

Evaluator(s) qualified by (i.e. SGA Evaluator training, MEA, ITS, etc.): _____

Materials Validated: Yes or No Year: _____ Validation company name: _____

EVALUATORS:

Name:

Task(s)

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____

Exhibit D

Task	Description	Operator / Contractor Equivalent Task(s)	WPHR used		Qualification Method used	
			Y	N	Initial	Re-qual
A1	Operating / Maintaining Propane Air Facilities					
A1a	Operating Propane Air Facilities					
D1	Compressor Stations ¹¹					
E1	Welding Pipelines					
E1a	Visual Inspection of Welds					
E2	Perform Nondestructive Testing on Steel Pipelines & Welds					
E3	Repair of Steel Pipelines by Grinding					
F1	Joining Plastic Pipe – Manual & Hydraulic					
F1a	Joining Plastic Pipe – Manual Only					
F2	Joining Pipe with Mechanical Fittings					
F3	Joining and Repairing Polyvinyl Chloride (PVC) Pipe					
G1	Excavating and Backfilling					
G2	Horizontal Directional Drilling					
G3	Other Boring Methods					
H1	Installing / Replacing / Repairing Meter and Regulator Sets					
H2	Installing / Replacing / Repairing Gas Service Lines					
H2a	Visual Inspection of Gas Lines					
I1	Application and Maintenance of Corrosion Control Systems					

¹¹ This is a place holder only; at this time Columbia does not operate or maintain any compressor stations.

Exhibit D

Task	Description	Operator / Contractor Equivalent Task(s)	WPHR used		Qualification Method used	
			Y	N	Initial	Re-qual
I1a	Evaluation and Application of Corrosion Control					
I1b	Reading Test Stations & Evaluation and Application of Corrosion Control					
I1c	Evaluation and Application of Above Ground Corrosion Control					
I1d	Monitor Corrosion Control Methods / Patrolling & Surveillance					
L1	Tapping & Stopping Pipelines – All Sizes & Pressures					
L1a	Tapping & Stopping Pipelines – 4” and smaller tap hole; 60 PSIG and less					
L1b	Tapping & Stopping Pipelines - Self Punch Tees & Low Pressure Bagging					
L1c	Tapping & Stopping Pipelines – Self Punch Tees					
L2	Purging Pipelines – No Restrictions					
L2a	Purging Pipelines – Service Lines and Meter Sets					
L3	Operating / Maintaining Odorization Equipment					
L3a	Operating / Maintaining / Monitoring Farm Tap Odorizers & Odorant Levels					
L3b	Monitoring Odorant Levels					
L4	Gas Control – Controlling and Monitoring Gas pressure and flows; Monitoring Odorization Levels; and AOC’s					
M1	Leak Survey, Classification & Patrolling					
M1a	Leak Classification & Patrolling					

Exhibit D

Task	Description	Operator / Contractor Equivalent Task(s)	WPHR used		Qualification Method used	
			Y	N	Initial	Re-qual
M2	Locate and Mark Underground Facilities					
M2a	Verifying Facility Location for Company Purpsoe					
M3	Pressure Testing Pipelines					
M4	Inspect and Test Pressure Limit Stations, Relief Devices and Pressure Regulating Stations					
M4a	Adjusting Pressure at Regulating Stations and Operating a By-Pass					
M4b	Reading and Changing Charts					
M4c	Operating and Maintaining Self-Operated Pressure Regulators					
M4d	Operating and Maintaining Pilot-Operated Pressure Regulators					
M4e	Operating and Maintaining Instrument Controllers					
M4f	Operating and Maintaining Transducers and Bristol Controllers					
M4h.1	Inspecting and Lighting Catalytic Heaters					
M5	Maintenance & Repair Line Valves & Critical Valve Inspection					
M5a	Critical Valve Inspection					
M7	Preventing & Responding to Potentially Hazardous Situations					
M7a	Preventing Accidental Ignition					
M8	Install / Replace / Repair Mains & Transmission Lines					
M9	Repair / Protect Cast Iron Pipe					

Exhibit D

Task	Description	Operator / Contractor Equivalent Task(s)	WPHR used		Qualification Method used	
			Y	N	Initial	Re-qual
M10	Abandon Gas Piping / Discontinue Service					
M10a	Discontinue Gas Service					

FOR INTERNAL USE ONLY

Date received: _____ Date completed: _____

Materials Validated: Yes or No When: _____ By whom: _____

Comments:

Gap Analysis reviewed and completed by S&C staff member:

Name: _____ Date: _____

Exhibit E

Failure to Qualify

Human Resource Guidelines on Qualification of Employees

Columbia Gas has designed a program to assist the employee in successfully completing requirements of its DOT Operator Qualification Program. The program includes a customized training plan designed to 1) meet the needs of Columbia Gas in carrying out its legal and regulatory obligations, and 2) assisting and supporting the individual employee in obtaining legally-required qualifications. However, Columbia Gas does not guarantee the employee will receive qualification to perform any Covered Task and is not obligated to ensure employee success.

The local leadership team, HR and PS&C will support and review the plan and the individual qualification process as necessary.

If an employee fails to qualify to perform a covered task that is an essential job function, the following action shall be taken:

1. The individual will immediately be deemed non-qualified to perform that particular task.
2. If possible, an evaluator will provide immediate feedback to the individual on his/her performance of the covered task and noted deficiencies.
3. Where it is permissible for non-qualified employees to perform Covered Tasks, and in accordance with the requirements of Columbia Gas's Operator Qualification plan (Section C), the individual may, at the option of Columbia Gas, be asked to perform the task he/she did not qualify. Columbia Gas will make this determination in accordance with its operational demands, the obligations and responsibilities of the job classification, and pursuant to all applicable requirements of its DOT Operator Qualification (OQ) plan.
4. In the immediately following *30-day period, an evaluator will evaluate the individual's qualification to perform the covered task as required by Columbia OQ Plan. During this *30-day time period, at Columbia Gas's option, the individual may continue to work under the direct supervision of a qualified individual and in accordance with the requirements of the OQ Plan.
5. If an individual fails to qualify on the second attempt, he/she will go through re-training within *30 days. During this *30-day time period, the individual may continue to work under the direct supervision of a qualified individual.
6. Within the following *30-day time period, the completion of the written training plan and the third attempt to qualify the individual shall be conducted. If the individual fails to successfully qualify on the third attempt, Human Resource and Local Leadership will decide upon the appropriate action taken.

The 30-day time period may be waived at management's discretion.

Exhibit F

CDOQNOC[GS standard]
[GS standard – title]
Issued: [date]

NiSource Gas Distribution – Columbia Gas Companies
Operator Qualification Plan

Notification of Change Form

The following Procedure(s) or Task(s) has been modified or changed

Procedures: _____

Tasks: _____

Indicate type of change:

- Modification to company policies or procedures
- Use of new equipment and/or technology
- Change in State or Federal regulations
- New information from equipment or product manufacturer
- Other, explain

WMS job number the meeting was charged to _____

The modification or change is described as follows.

This is a Level 2 Impact to the Company’s OQ Cover Tasks. This Communication of Change is effective [date], with a target implementation date of [date]. This information is required to be communicated to all individuals (including contractors) qualified for tasks [tasks]. The changes have a [impact] impact, and are [ex. for moderate: communication only and does not affect the skill and ability of performance].

The following document numbers or descriptions indicate revisions or modifications to written procedures.

[standard no.], “[title]” – [tasks affected]

- a. Narrative description of change.

Exhibit G

OQ Plan Proposed Change Form	
Date:	Reason for Proposed Change <input type="checkbox"/> Annual Review <input type="checkbox"/> Change in code <input type="checkbox"/> Other
Type of change:	<input type="checkbox"/> Editorial <input type="checkbox"/> Technical <input type="checkbox"/> Other
Brief Description of Change:	
Existing text:	
Proposed text:	
Name of Individual Proposing Change	
Printed Name:	
Signature:	

ATTACHMENT 2

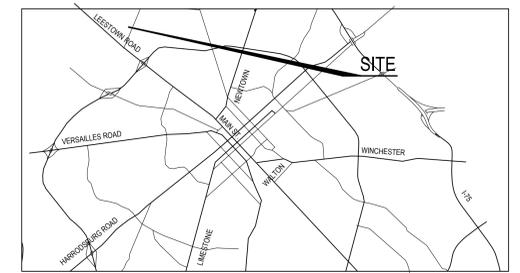
LANDSCAPE REQUIREMENTS

VIA AREA (EXCLUDING STORAGE / LOADING / UNLOADING AREA)	96,270 SF
LANDSCAPE AREA REQUIRED (96,270 SF x 5%)	4,813 SF
AREA PROVIDED	5,735 SF
TREES REQUIRED (4,813 SF / 250 SF)	20
TREES PROVIDED	59

SITE STATISTICS

INTERIOR LANDSCAPE REQUIREMENTS FOR OUTLOTS

OUTLOT (SF)	VIA	REQUIRED LANDSCAPE AREA(SF)	PROVIDED LANDSCAPE AREA(SF)
1. LANDSCAPE AREAS SHOWN ON PLAN AS HATCHED AREA.			



VICINITY MAP
NTS

SITE STATISTICS

SITE ZONE: I-1 (LIGHT INDUSTRIAL)

SITE AREA: 341,510 S.F. (7.84 ACRES)

TOTAL AREA: 341,510 S.F. (7.84 ACRES)

GROSS FLOOR AREA

MAIN BUILDING	Basement Floor Gross Area:	8,600 s.f.
First Floor Gross Area:	Office:	32,335 s.f.
Warehouse:		11,371 s.f.
FIRST FLOOR SUBTOTAL:		43,706 s.f.
Second Floor Gross Area:		14,793 s.f.
Storage Mezzanine (Warehouse) Area:		1,994 s.f.
Office / Lobby Area:		12,799 s.f.
SECOND FLOOR SUBTOTAL:		14,793 s.f.
Total Gross Area:		67,099 s.f.
ACCESSORY BUILDINGS	Total Gross Area:	3,870 s.f.
TOTAL BUILDING AREA:		70,969 s.f.

SITE COVERAGE (BUILDING FOOTPRINT AREA)

MAXIMUM PERMITTED BUILDING COVERAGE: NO LIMITATION

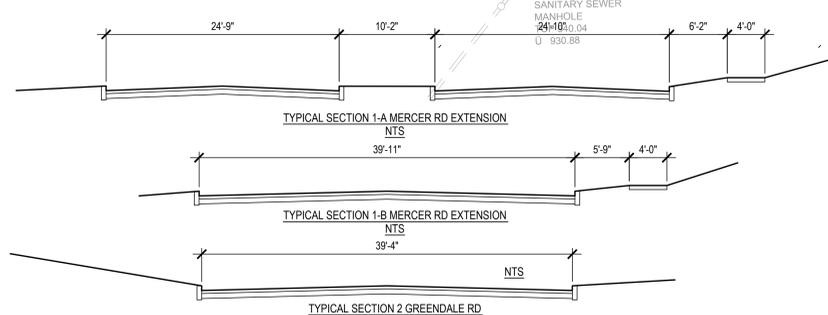
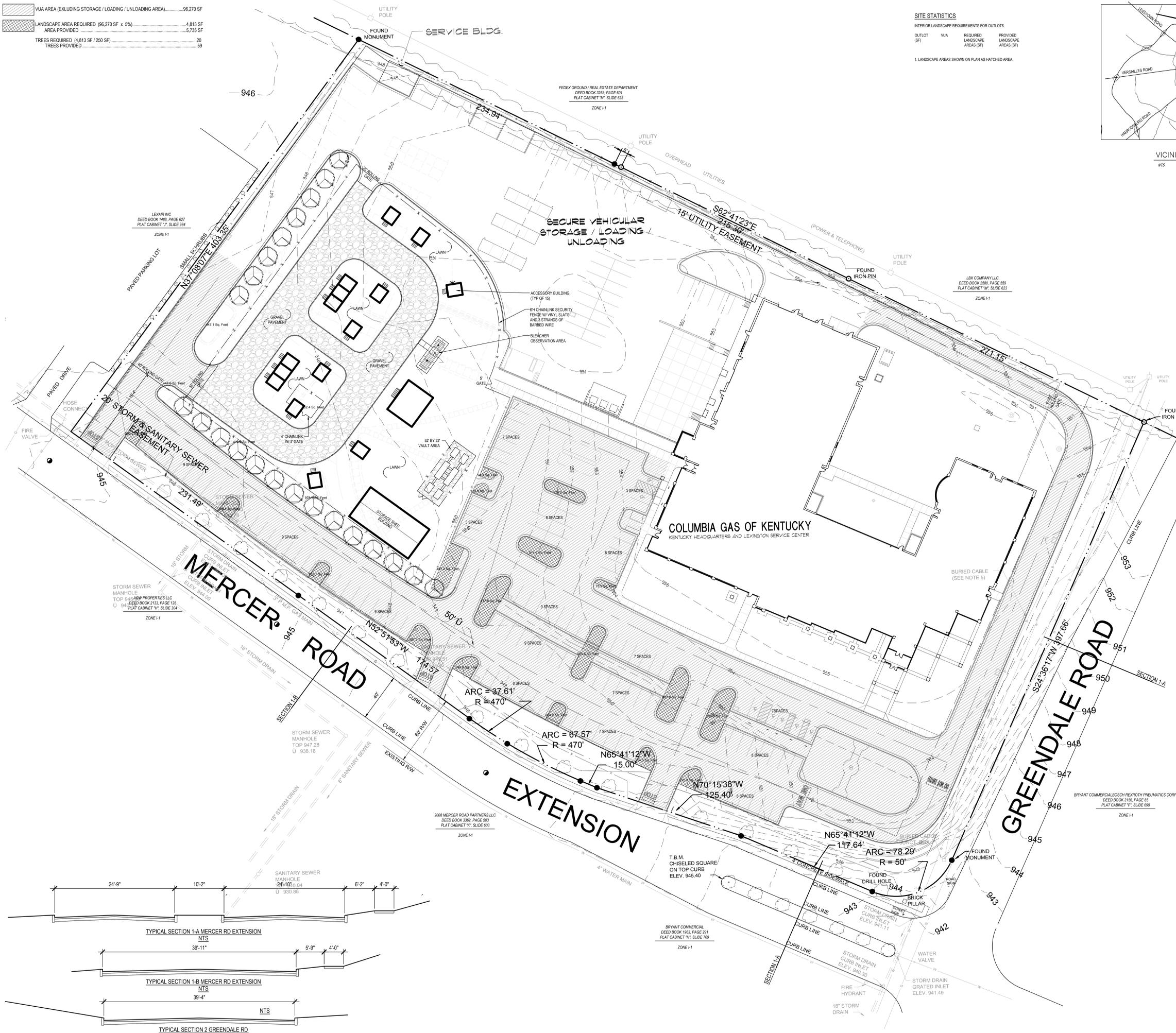
MAXIMUM BUILDING HEIGHT: 75 ft

MAXIMUM BUILDING HEIGHT: 32 ft

PARKING REQUIREMENTS

ONE (1) SPACE PER EVERY TWO (2) EMPLOYEES ON A MAXIMUM SHIFT

PARKING PROVIDED: 125 SPACES



JOB NO.	1606
DATE	--
DRAWN	mb
CHECKED	--

REVISIONS

No.	Description	Date

X:\Projects\2016\1606\DWG\1606-NEW-NEW.dwg
User: mb
Date: 2016-11-10
Sheet Layout: SD

ATTACHMENT 3

**Detailed Estimate of Acquired Property
Classified According To FERC's Uniform Systems of Accounts For
Gas Utilities**

Account No.	Account Description	Estimate
Gas Plant Account 375	Structures and Improvements	\$1,426,020
Gas Plant Account 391	Office Furniture and Equipment	\$ 141,278
Gas Plant Account 394	Tools, Shop and Garage Equip- ment	\$ 382,500
Gas Plant Account 398	Miscellaneous Equipment	\$ 5,250
TOTAL – Account 101	Gas Plant in Service	\$1,955,048

ATTACHMENT 4

**CONSTRUCTION OF NEW TRAINING FACILITY VS. USE OF OUT-OF-STATE
TRAINING FACILITIES**

Annual Cost of New Training Facility:¹

Annual Maintenance & Operation Cost	\$ 11,528
Annual Depreciation ²	53,088
Return on Investment ³	<u>164,420</u>
 Total Annual Cost	 <u>\$229,036</u>

Annual Cost of Out-State Training Facility Use:¹

Meals & Lodging-New Hire	\$ 73,100
Meals & Lodging-New to Role	15,390
Meals & Lodging-Refresher	111,020
Labor Costs Associated with Travel-NH	42,497
Labor Costs Associated with Travel-NTR	8,566
Labor Costs Associated with Travel-Refresher	<u>65,219</u>
 Total Annual Cost	 <u>\$315,792</u>

Total Savings: \$86,756

Assumptions:

¹All costs not noted are the same for each alternative

²Annual depreciation expense is calculated using the depreciation rates in Columbia's most recent depreciation study (See Application (Tab 49) in Case No. 2016-00162) and applying those rates to the proposed facilities' individual components

³Return on Facility of 8.41 percent (Requested Rate of Return in Case No. 2016-00162)